

## Appendix 2 - Detailed Comments on the 2021 Local Plan

The comments below follow the precise order of the Updated Plan document.

### The Updated Plan

1. The Updated Proposed Submission Version Local Plan sets out the Council's proposed approach to meeting Warrington's need for new homes and jobs up to 2038, and identifies the required infrastructure.
2. The Plan aims to provide a set of strategic planning policies to assess individual planning applications. It follows previous periods of consultation in 2016 and 2017, and further consultation in 2019.
3. The past responses to these consultations from the public, Parish Councils and Elected Members have been summarised by the Council in the Updated Plan, as follows (I have underlined those most closely relating to transport):
  - Release of an excessive amount of Green Belt land due to housing/employment requirements being overstated and brownfield capacity underestimated.
  - Imbalance of Green Belt release, north vs south Warrington.
  - Widespread concern re traffic and air quality.
  - Concern that new home locations do not reflect where the majority of existing and future employment opportunities are located, resulting in more car-based commuting/congestion.
  - Employment locations only providing low value jobs.
  - Impact on social infrastructure, especially schools, GPs and the hospital.
  - Concerns (environmental/ecological) re loss of countryside.
  - Scepticism whether necessary supporting infrastructure would actually be delivered, and whether the likely funding gap in the Infrastructure Delivery Plan would be filled.
  - Concern that new (housing) development would not be affordable for local residents, and will become commuter housing for Manchester/Liverpool.
  - Wide-ranging objections to the proposed Garden Suburb re loss of Green Belt, environmental impacts, impacts on the transport and social infrastructure, and concern again that necessary supporting infrastructure would not be delivered in practice.

- Objections to the South West Urban Extension and Waterfront (including Port Warrington), loss of Moore Nature Reserve and traffic/congestion impacts.
  - Objections re Peel Hall loss of green open space and traffic/air quality.
  - Range of objections re sites in outlying settlements re loss of Green Belt, highways impacts etc.
4. My own representations in 2019 related particularly to transport, and the need to promote - not just with well-intentioned words, but with the guaranteed, funded, delivery of actual infrastructure and services - public transport and attractive opportunities for cycling and walking, with the infrastructure in place before the housing was built.

### Particular Concerns

5. I am particularly concerned that:
- Opportunities to develop housing around existing public transport nodes, notably the town central core, lands in the north-west of the Borough close to the Liverpool-Warrington rail route (where a new rail station could be provided) and lands to the south of Birchwood Centre (where a large modern station already exists), are not being sufficiently exploited, or in the case of the north-east and Birchwood, at all.
  - There was and is a fundamental flaw in the Plan in that the majority of new residential development is planned for south of the Mersey, MSC and Bridgewater Canal, whereas the majority of facilities, retailing (in the town centre, on Winwick Road and at Gemini) and employment, together with the town centre, two main line railway stations and the hospital are on the north side of these congestion-creating obstacles.
  - Much of the travel needs of the new low-density development planned for South Warrington will inevitably be met by the private car, with attendant added congestion at key locations such as the Knutsford Road swing bridge, Latchford centre, Stockton Heath High Street and swing bridge and Lumb Brook Bridge. No measures are offered to deal with this, unsurprisingly as it will be near-impossible to do so.
  - The new low-density estates will be extremely difficult to serve efficiently and financially-viably by bus, and of course completely impossible by rail. Bus services are unlikely to be better than half-hourly to hourly (daytimes) for most of the proposed developments - if that. Evening/Sunday services are likely to be sparse/non-existent.
  - Almost all of the proposed South Warrington suburban development will be beyond typical convenient walking distance from the nearest main centre (Stockton Heath), and most will be uphill for cycling from Stockton Heath centre. Walking and cycling will in practice not prove to be main modes.

- There is absolutely no guarantee that any necessary supporting infrastructure will be delivered in practice, due to acute financial pressures on local and central government. Even well-intentioned measures such as developer contributions towards additional bus services are likely to peter-out after two or three years.
- The all-too-attractive proximity of the M56 (compared with Warrington Central rail station) is likely to further exacerbate the traffic congestion on this route into Manchester city centre, Salford Quays etc.

6. The Updated Plan states that the Council is re-basing the Plan Period to run from 2021 to 2038 (total 18 years), but has given consideration to an overall timescale of at least 30 years “to assist in ensuring that the revised Green Belt boundaries are capable of enduring over the long term.” But the previous assurances about the Green Belt are already being torn up by the 2021 Plan.
7. The Council has undertaken an update of the Economic Development Needs assessment (EDNA), and is now confident that an annual housing target of 816 will be sufficient.
8. The Updated Plan makes provision for the full requirement of 316.26ha of employment land.
9. The Plan states that it is optimising the development potential of the existing urban area, including:
  - Intensifying development in the town centre (though insufficiently).
  - Intensifying development in the inner area of Warrington.
  - Opening-up the Waterfront as a new urban quarter (but, inexplicably, linking this to approval for the costly Western Link road scheme).
10. However, this isn’t sufficient to meet projected needs, the Updated Plan argues, and the proposed spatial strategy requiring Green Belt release includes:
  - SE Warrington Urban Extension, with a major delivery of 2,400 homes up to 2038 with a further potential 1,800 beyond 2038 (total 4,200).
  - Development of Fiddlers Ferry with 1,300 homes up to 2038 and a possible further 450 beyond that date.
  - Development of Thelwall Heys of 310 homes.
  - Incremental growth in outlying settlements of c800 homes.

(total 4,810 homes before 2038, plus 2,250 after 2038, total 7,060)

11. The Updated Plan claims that “the South East Warrington Urban Extension (formerly termed the “Garden Suburb” in earlier plans) will deliver a wide range of infrastructure and services to support the new development”, and states that the Urban Extension will not be completed until after the end of the Plan Period. It claims that the Allocation policy “will ensure that development is coordinated with the delivery of supporting infrastructure.” There will be additional consultation on a Development Framework.
12. The Updated Plan also states that “the Thelwall Heys site (310 homes) has the benefit of increasing housing delivery in the early part of the Plan Period.”
13. The South West Urban Extension proposed in the previous Plan apparently has effectively and gratifyingly been replaced with the Fiddlers Ferry development. There were also concerns that the SWUE would adversely impact on the proposed Western Link highway scheme.
14. The Massey Brook Lane (Lymm) development is noted as withdrawn from the Local Plan process at the request of the developer. It is unclear what would happen if another developer stepped forward.
15. The Updated Plan still proposes the South East Warrington Employment Area, at 137ha, at the junction of the M6 and M56 motorways. This will be near-impossible to serve viably and attractively by public transport and is beyond walking or convenient cycling distance from the remainder of South Warrington. It is far-remote from any rail station. It is not in any way clear how such a proposal fulfils Council objectives of encouraging the use of sustainable transport modes. If the site includes distribution hubs, they will of course be unservable by rail freight, and again this will work against sustainability. The area already regularly suffers from highway congestion.
16. It is noted that the Council has concerns about any wider extension to the South East Warrington Employment Location, as well as land east of the M6 J21.
17. It is noted that “concerns around the potential impact on the (proposed) Western Link” have resulted in the dropping of proposals for both Port Warrington and Warrington Commercial Park. The abandonment of the Port Warrington proposal runs counter to current Government policy, and to Warrington Borough Council’s own policies for sustainability.
18. The Updated Plan suggests that there will be 6 weeks of consultation commencing October 2021, and that the Council will then review representations prior to submitting the Updated Plan to an Examination in Public, at earliest in Summer 2022. The Council is anticipating adoption of the Updated Plan during 2023. Adoption without significant amendment would be deeply regrettable, and probably legally challenged.
19. The Updated Plan admits that “the major source of pollution at a local level.....has been assessed as related to transport, primarily road.” (para 2.1.50)

20. The Updated Plan also states that Warrington Borough Council “has declared a climate change emergency” and is seeking to be carbon-neutral by 2030, less than a decade away. This, though very laudable, would seem to be extremely challenging, particularly if new residential areas are difficult to serve efficiently and viably by public transport, and if new employment land is proposed to be adjacent to motorways and extremely remote from rail passenger or freight access.
21. The Updated Plan notes that the town is located on the Liverpool-Warrington-Manchester and the West Coast Main Line rail routes. However, it does not acknowledge that:
- Green Belt land south of the extremely-well-served Birchwood station is not zoned for residential development (the westbound platform adjoins agricultural fields). The land immediately south is designated a peat reserve, but south of that could be available for development, linked by a new road and road-over-rail bridge to Birchwood rail station and shopping centre, as well as the Birchwood Science Park employment area.
  - There could be an opportunity to create a new rail station at the north-west borough boundary east of Barrow Green (the latter is in Halton), in connection with new housing re-directed from South Warrington, thus exploiting the existence of the passenger service on the Liverpool-Warrington Central-Manchester “CLC” rail network there (see later section on Fiddlers Ferry). The new station would ideally be accessed immediately north of the railway and west of the A5080, so would be one metre inside the Halton boundary. The new station would be readily accessible from Fiddlers Ferry but also serve the large housing concentration (in Halton) east of the A557 Watkinson Way and north of the A562.
  - Over the past several decades, the logistics facilities of Warrington have almost entirely (with the exception of the Dallam siding and the Royal Mail depot) been developed away from both rail routes, to be served entirely by HGVs and light goods road vehicles, with consequential traffic effects. Warrington Borough Council has shown no enthusiasm for rail freight, and has seemingly-ignored the possibilities.
22. The document does, commendably, briefly note the impending advantages of HS2 and the promised, though as yet unsecured, improvements from Northern Powerhouse Rail/HS3 (assuming the latter goes ahead). But it apparently fails to grasp the significance of, and exploit the major significance of, the new opportunities that would follow from released capacity on the WCML in terms of rail-connected freight distribution. The Plan does not acknowledge the additional strain that establishing an HS2 hub at Bank Quay - however desirable - will place on the local highway network..
23. The Updated Plan comments that the majority of bus services are operated commercially, mainly by the very up-to-date and efficient municipally-owned Warrington’s Own Buses fleet, but fails to mention that bus use - even before the SARS-COV-2 pandemic - had all but halved in the preceding decade, and that there is very little local authority finance available to support socially-necessary but unremunerative services (as an illustration, there are already just two return evening

journeys in four hours on route 5, Warrington-Stockton Heath-Grappenhall-Thelwall-Lymm, and even these have been temporarily axed due to staff shortages).

24. The Updated Plan also notes that “Warrington’s compact size and fairly flat terrain provides an excellent opportunity” for more local journeys to be made by cycling and walking. However, it fails to acknowledge that:

- Much employment is well outside the centre, at Birchwood and at Omega, and thus at a considerable distance from many areas.
- Access to many locations by cycling is made hazardous and deeply off-putting by gyratory road junctions such as on the A57 west and east of the town centre and at Bridgefoot, and by speeding traffic.
- The proposed South East Warrington Employment Area will be (in convenience terms) virtually inaccessible from most of the town by cycling/walking.
- Despite the “fairly flat terrain” claim, there are long and fairly steep hills in South Warrington on Lumb Brook Road and the A49 south of Stockton Heath, suggesting that cycling to/from the South East Warrington Urban Extension, and indeed any residential development between the A5061/A50 and A49 radials will be very limited.

25. The Updated Plan goes on to acknowledge that “the dominance of the car has led to the priority for other travel modes being reduced and serious congestion problems within the town.” The document could also have commented (though it did not) that the supremacy of the car has fuelled out-of-town shopping, leading to the Winwick Road “Shedsville” image and the further very severe decline - even before SARS-COV-2 - of the historic town centre. The pandemic has made the town centre retail situation worse still, and the extent to which this fresh damage will be long-lasting remains unknown at this stage, partly because (a) the precise course of the pandemic itself is unknown and (b) business rate reform has again been deferred.

26. The Updated Plan lists a number of acknowledged key challenges that include:

- Limited housing and employment land supply.
- Housing affordability concerns.
- Meeting the needs of an ageing population.
- Car dependency, congestion and air quality impacts.
- Areas of deprivation.

27. The Updated Plan also lists “future opportunities for Warrington” as including:

- Its connected network of green spaces and parks.
- Its waterways and waterfronts and the unique opportunities they bring.
- Attractions such as Walton Gardens.

28. However, the above completely fails to mention the benefits of having pleasant open countryside immediately adjacent to existing settlements in South Warrington. In particular, the area of rural land that lies between the A5061/A50 to the east and the urbanised areas of the Cobbs Estate, Appleton and Dudlows Green is a real asset to those communities in terms of local daily walking and cycling, yet it is that very area that the Council proposes to site fresh major developments upon, severely damaging their amenity value.

### The Updated Plan's Vision and Spatial Strategy

29. The Vision for Warrington states (amongst four objectives) that Warrington will be a carbon-neutral exemplar "green" town. This ideal clearly is not compatible with developing low-density housing estates, difficult to serve efficiently by public transport and likely to attract "two cars per household" residents, sited on prime agricultural land. It is in complete contradiction with the South East Warrington Employment Area proposal.
30. The Vision states that "New development will be successfully integrated into Warrington's transformed public transport system" (my underlining). But the Council is unlikely to have the funds to support marginal or loss-making bus services (all evening and Sunday services are likely to be loss-making).
31. The claim regarding "transforming" the public transport network ("Vision Warrington 2038 and Beyond", pp39-40) is purely aspirational rhetoric at this stage, and may in practice prove to have little or no physical substance. The Council does not possess the powers and resources to "transform" (as it puts it) the public transport network, as (a) bus services are primarily provided by operators that must (even if publicly owned) cover their capital and running costs, and depend ultimately on revenue raised from passenger demand (b) it appears highly improbable that Central Government will allocate enough supportive resources to "transform" public transport in the town.
32. This is particularly so given that Warrington's economy is buoyant (outstandingly so, in a North of England context, as is acknowledged in para 3.1.6 of the Updated Plan)) and thus extremely unlikely to merit priority Government assistance compared with less-prosperous sub-regional economies such as St Helens, Knowsley, Wigan, Blackpool and East Lancashire. Put bluntly, Warrington may tick very few Government boxes, and it would be wholly self-delusional to assume otherwise.
33. Subsequently, in para 3.1.13, the Updated Plan refers to reducing the reliance on the private car. Yet the construction of large numbers of low-density (or even medium-

density) new houses on currently-agricultural land in South East Warrington would almost certainly have the exact opposite outcome.

34. The Updated Plan claims to have revised and refined earlier Objectives, following public consultation. This has resulted (in the Updated Plan) in Objective W2: “To ensure Warrington’s revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.” But by then the irreversible damage to the Green Belt will have been done, and possibly contradicting similar such well-intentioned assurances in much earlier plans.
35. Objective W4 in the Updated Plan laudably aims to “provide new infrastructure and services (and) promote safer and more sustainable travel....”. But as already noted, there is absolutely no guarantee that the necessary infrastructure in terms of public transport can be delivered. The creation of new housing estates across arable land in South Warrington, again, will inevitably be very difficult to serve viably by bus, and of course completely impossible to serve by rail, as well as being unattractive for cycling due to topography.
36. A further point regarding bus services is that any new services serving new settlements across South East Warrington will have to negotiate either the congestion around Knutsford Road Swing Bridge and Latchford, or the congestion around Lumb Brook Bridge and Stockton Heath High Street. Both corridors are likely to make any promised new bus routes both slow and unreliable, despite the best efforts of bus operators.
37. Objective W5 refers to reinforcing the character of Warrington’s countryside element. The Updated Plan’s housing proposals in relation to South Warrington do not fit with this objective. Again, Objective W6 again refers to minimising the impact of development on the environment. The housing proposals for South Warrington would clearly have a major impact on the area’s environment, and their unstoppable highway traffic impacts would further damage the area.
38. Additionally, the major Proposed Employment Area near the intersection of the M6 and M56 motorways would inevitably add very significant car-commuter and commercial vehicle traffic to other parts of South Warrington. Increased flows and attendant increased congestion and air quality problems would primarily affect the A50/A5061 through Grappenhall and Latchford, but would also affect other secondary routes across South Warrington.
39. The Updated Plan rightly states that the main priority remains to optimise the development potential of the existing urban area. The massive residential developments proposed for South Warrington, and the Proposed Employment Area at the M6/M56 intersection, are plainly not the way to do this, and indeed work in exactly the opposite direction, accelerating urban sprawl and incentivising use of the private car for transport.
40. It is fully accepted that the provision of an adequate supply of new, affordable homes is a very high priority for Central Government, for Warrington Borough Council and for the



community as a whole, that the Council's drive to achieve this should be wholeheartedly supported, and that land should be made available to achieve this objective. It is the detail of the Updated Plan that is being questioned here.

41. The Updated Plan asserts that "the existing urban area can accommodate around 11,800 new homes. This means there is the requirement to release Green Belt land for around 4,500 homes." But this can be challenged on two primary grounds:
  - Is the 11,800 homes really the upper limit in relation to the existing urban area, particularly if land currently used for non-residential purposes (eg car showrooms, parking, motor repair facilities etc) could be released for housing and those activities relocated onto industrial estates?
  - Even if Green Belt land needed to be released, is the Green Belt land in South Warrington the right Green Belt land to be re-zoned for development? The irony of the retention of Green Belt status for land just south of the excellent transport hub at Birchwood rail station and very close to Birchwood Centre has already been referred to.
42. In relation to existing urban areas, there would seem to be a significant opportunity for the funding of the relocation of a number of commercial activities and the release of land for housing. Motor-trade activities in particular are potentially "footloose" in that they largely attract customers and a workforce that are already car-users, and so have little need long-term to be in inner-core areas of the town.
43. A further point relates to retailing. On-line shopping is clearly likely to remain at a high level, even if not quite at "pandemic peak" levels, and so car park capacity at some retail-park sites could be released for limited quantities of housing. This could include supermarkets, where a percentage of car-parking land (now poorly used or even unused) could be released for flats.
44. There are other commercial activities that do not need to be in the urban core as they are not, essentially, town-centre activities. An instance is those activities in the Haydock Street/Pinners Brow/Lythgoes Lane triangle, which could readily be redeveloped for flats, whose residents would have easy walking access to town centre shops and bus and rail stations.
45. The inclusion of the Fiddlers Ferry site in future planning of housing, to the value of 1,300 homes by 2038, with a further possible 450 homes beyond 2038, is very welcome. But it is not clear why an initial pre-2038 limit of 1,300 has been set at all. It is assumed that this figure is related to the size of the brownfield site that will become available after the demolition of the power station. But does the development have to be completely fitted into the brownfield site? Could it not be a little larger?
46. A key requirement of Fiddlers Ferry as redeveloped will be transport links. It is assumed that, in terms of sustainable public transport, the new housing when built will be served by either a bespoke bus service or diversion of bus services from the A562 (or the two

combined). In this instance, the viability of such services will be considerably enhanced by expanding the proposed pre-2038 housing total to, say, 4,000, with a commensurate reduction in proposed housing in South Warrington of perhaps 2,700 homes. This might be followed post-2038 by a further 1,000 homes.

47. An enhanced brownfield site could be served by a reserved-track bus priority loop, with all homes within easy walking distance of an interurban bus service linking Widnes town centre with Warrington town centre, including bus priorities along the A562 corridor. It is not clear why this is not being proposed, other than there being an unavoidable initial delay in site availability pending demolition of the power station and decontamination of land. It is assumed that both these could be achieved by perhaps 2028, or 2030 at the very latest.
48. There seems little obvious reason why the brownfield site should not therefore be expanded in the medium term onto adjacent undeveloped land, including land on the north side of the A562, even if encroaching onto the Green Belt there. A greatly-expanded Fiddlers Ferry “garden suburb” would support better facilities such as schools and shops and better public transport services.
49. Also, if a rail passenger service was to be introduced on the Ditton Junction (Widnes)-Fiddlers Ferry-Warrington Arpley route, a settlement of 1,300 households would be likely to prove inadequate to justify the provision of a new rail station (likely costs at current prices £20m-£25m), as it would lack critical mass. A settlement of 4,000-5,000 new homes would be very considerably more likely to make a viable case for a new station.
50. In addition to the impending availability of the Fiddlers Ferry brownfield site, there may be a further employment-land site, smaller but very close to the town centre, from a future part of the former Crosfields factory immediately west of Bank Quay station if not all the site is needed by its new owners. It is unclear whether the potential of any re-use of this key site for new employment activities has been taken account of in the Updated Plan.
51. The issue of relocating the controversial South Warrington Proposed Employment Area (M6/M56 site) is more complex, as any alternative site would have to:
  - Have available land, and not create a “bad neighbour” for residential areas.
  - Be accessible for commuter traffic, preferably by public transport or other sustainable modes.
  - Be accessible for HGV traffic without introducing (or worsening) traffic on residential roads or in already-stressed (in congestion terms) areas. This factor points to a location near the M6, M56 or M62 motorways, but ideally would also point towards a rail-served site so that any major distribution centres could use rail.

52. It is noted that Fiddlers Ferry is to offer a 101ha employment site, to provide for a mix of industrial and distribution activities. It would clearly be helpful to national objectives of switching freight to rail if the latter could be located immediately alongside the Ditton Junction (Widnes)-Fiddlers Ferry-Warrington Arpley rail route, which is currently little used but which may see a future passenger service as part of the Northern Powerhouse Rail initiative by Central Government.

53. The two other broad areas (within the Borough boundary), that are not mentioned in the Updated Plan, that could conceivably offer large employment sites accessible both from the motorway network (if link roads were constructed to the nearest existing motorway junction) and the existing rail network (assuming a freight connection or sidings could be created) are:

- Immediately east of the M6 and south of the Liverpool-Warrington-Manchester rail route.
- Immediately north of the M62 and west of the West Coast Main Line.

54. There are other sites suitable for major rail-connected employment locations that could feature rail-linked distribution hubs, on the same principle as those at DIRFT Daventry, but those are outside the Borough boundary. Their potential, however, should be taken into account, working with (rather than in competition with) adjacent local authorities such as St Helens MBC.

55. Again, in para 3.3.10 of the Updated Plan, there is the assertion that “the South East Warrington Urban Extension (SEWUE) will deliver.....high levels of priority for public transport services.” The new extension might indeed provide bus priorities, but there are:

- No obvious means whereby these bus services will have ensured rapid and reliable traffic priority between the edges of the SEWUE development and Stockton Heath, Latchford and the town centre, other than the existing (or potentially-lengthened?) bus lanes on the A49 Wilderspool Causeway and A5061 Knutsford Road. Congestion in Stockton Heath and at Knutsford Road Swing Bridge/Latchford would remain an insuperable problem.
- Absolutely no guarantees that bus services would be sufficiently viable to operate without subsidy. There would be a particular question-mark over early mornings, evenings and Sundays. Yet it is the lack of services at those quieter times that often forces the purchase of a car, motorcycle or moped.

56. The Updated Plan refers to a number of other policy options that were considered but discarded during the most recent preparation of the Plan:

- A more dispersed pattern of settlement.
- An urban extension to the west of Warrington.

- An urban extension to the north of Warrington.
- An urban extension to the east of Warrington.

57. It is accepted that a more dispersed pattern of settlement is undesirable if it involves significant numbers of new homes, as this will be very likely to promote additional car travel on already-busy radial routes, and such outlying settlements would lack services. However, it is suggested that some of these disadvantages are also inherent in the adopted strategy, eg increased car use.

58. It would therefore seem possible to consider perhaps 500-1,000 new homes to be built onto existing dispersed settlements, which would at least have the merits of spreading the consequential development pressure and highway traffic generation across numerous sites, rather than the Updated Plan's strategy of massively concentrating development across South Warrington. The build target for South Warrington could be commensurately reduced, though perhaps taking a pro-rata 100-200-homes share of the 500-1,000.

59. It is stated in the Updated Plan that an urban extension to the west would have a significant impact upon the Green Belt. But, again, this would seem to be no worse an outcome than having the proposed significant effect upon South Warrington. The concern to separate Widnes from Warrington is mentioned, but it is not clear exactly what the practical advantages of separating the two towns with Green Belt actually are. There are numerous examples in the UK of towns linking together, without apparent serious detriment to their occupants.

60. It is accepted that a major new settlement north of Warrington would have "considerable traffic impacts on the A49 and Junction 9 of the M62". But couldn't the exact same adverse comment be made about, for example, the Proposed Employment Area that is being promoted in the Updated Plan for the M6/M56 intersection, in relation to the A5061 and the motorway intersection there?

61. The Updated Plan rules out any urban extension to the east of Warrington due to "significant ecological impacts" and unspecified mineral reserves. The ecological impacts are doubtless a consideration, but it seems self-defeating to rule out housing east of the M6 and immediately south of the Liverpool-Warrington-Manchester rail route in the vicinity of Birchwood rail station and Birchwood Centre.

62. As noted earlier, constraints over sites have resulting in the dropping of the following:

- Port Warrington (due to Moore Nature Reserve and the proposed Western Link highway scheme).
- Warrington Commercial Park, again over impacts to the proposed Western Link.

- A wider extension of the South East Warrington Employment Location, over impact on the Green Belt and the local highway network.
- Land east of the M6 Junction 21 (the junction with the A57 to Irlam and Manchester).

63. The Updated Plan notes that the proposed Western Link (road scheme) is the largest transport infrastructure scheme in the Plan. The scheme will link the A56 Chester Road with the A57 Sankey Way. The Updated Plan states that it will reduce traffic levels on the existing road network, though it is unclear as to how adding this scheme to run to an intersection with the A57 at Sankey will reduce congestion on the Sankey Way, as turning-traffic movements at the intersection (already complex) seem likely to become further stressed.

64. The Updated Plan acknowledges in paras 3.3.31 and 3.3.32 that the South East Warrington Urban Extension (and several other key sites) “require extensive new infrastructure and improvements to existing infrastructure” before they can support new development, and that “the lead-in times for infrastructure delivery mean that new homes in these allocation sites will only be able to make a minimum contribution (to the new homes total) in the first 5 years of the Plan.”.

65. This is clearly a crucial admission. It is a recognition that very significant infrastructure is going to be needed in order to deal with the highway traffic implications of the South East Warrington Urban Extension (SEWUE).

66. The critical issue is not the infrastructure that could be provided within the boundary of the SEWUE, but what other infrastructure will be needed across the wider town transport network. It is obvious that major desire-lines of road traffic generated from the SEWUE would include Stockton Heath, Warrington town centre, Warrington General Hospital, Bank Quay and Central rail stations, the retail parks along the Winwick Road and at Gemini, and possibly the employment areas at Woolston Grange and Birchwood Science Park. All of these bar Stockton Heath are on the north side of the Manchester Ship Canal and River Mersey, whereas the SEWUE is of course on the south side.

67. Additional investment (eg at certain road junctions) might help to deal with some of these wider traffic effects. But the fundamental problems of dealing with additional traffic throughputs at Stockton Heath High Street and Knutsford Road Swing Bridge/Latchford would remain, and worsen. The Updated Plan is completely silent on how this is to be addressed.

68. Para 3.3.34 states that “the Council expects new development to provide a significant proportion of funding for infrastructure” (through S106 contributions). But the developers of a SEWUE would be most unlikely to fund improvements outside the immediate SEWUE development area. Even developments inside the SEWUE, such as revenue support for unremunerative bus services to Stockton Heath and Warrington, would not be indefinite, and might be typically expected to last 3-5 years at most.

69. In short, the SEWUE is likely to generate significant traffic volumes, and adverse consequences, across South Warrington, but it is likely that S106 contributions would only address a very limited proportion of those consequences. It would be very unwise for Warrington Borough Council to proceed on the basis that most of the costs of the infrastructure and the other support measures needed to meet the adverse effects of the SEWUE would be met by developers. And, as noted above, there would be no obvious solution in the cases of Stockton Heath High Street, Grappenhall and Latchford.
70. This then begs the question as to why the Updated Plan is proposing major residential and employment development in South Warrington when there is every prospect that highway congestion, already a problem in key locations, would significantly worsen. It questions the whole concept of locating developments south of the Bridgewater Canal, the Manchester Ship Canal and the River Mersey when so many key trip generators are on the north side of these three waterways. It is a fundamental flaw in the Updated plan.

### Green Belt Release

71. The arguments for the exceptional circumstances underlying the release of Green Belt land are, in principle, broadly accepted. It is their detail that should be challenged.
72. The principal approach that is being taken in the Updated Plan is to release former Green Belt sites that are close to the existing urban area. However, it is the loss of such sites that will have the greatest impact upon existing local communities and residents.
73. For example, the building-over of land south of Stockton Lane, immediately east of Lumb Brook Road and west of Grappenhall Village, will deny local residents from the Cobbs Estate, the eastern part of Stockton Heath and the western part of Grappenhall the opportunity for convenient walking and cycling access to the countryside immediately south of Stockton Lane. Also, the agricultural land to be built over will result in increased highway congestion on Lumb Brook Road and on Church Lane, Grappenhall, where capacity (due to the crossings of the Bridgewater Canal) is already problematical.
74. In contrast, the strategy of protecting Green Belt land further afield, whilst desirable in a narrow sense, is less useful to existing residents of South Warrington as it is more remote. Such areas are largely beyond, or far beyond, convenient walking distance from present urbanised areas and thus more likely to be accessed by car, eg for residents walking dogs or for children taking a cycle ride.
75. This suggests that the detail of which parts of the Green Belt should be released requires revisiting and an urgent fundamental re-think. The continued protection of Green Belt land to the south of Birchwood rail station, thus ignoring the very considerable advantages of any development in that area having direct access to a well-served rail station, existing bus services and a well-established shopping centre, has already been questioned earlier.

76. In para 3.4.10, it is stated that “the South East Warrington Urban Extension will ensure that a major proportion of Warrington’s need for housing can be met sustainably through comprehensive planning and infrastructure delivery”. But this generalised claim could be made for proposals in other locations - it does not inherently follow that it is only valid for the SEWUE proposal. Furthermore, as already noted, it does not follow that either the infrastructure will be provided in its entirety or that, even if it was, it would solve all the consequential highway congestion problems that SEWUE would bring.
77. The statement in para 3.4.10 that “Green Belt release in the outlying settlements will increase housing choice” also appears to be a highly-generalised claim. Equally, the argument that it would “support the vitality and viability of local services” could probably be applied to almost any proposal.
78. Similarly, the generalised claim in para 3.4.10 that “the South East Warrington Employment Area will make a significant and sustainable contribution towards meeting Warrington’s current and long term employment development needs” could be made of alternative sites.
79. The use of the word “sustainable” in relation to a development remote from the town centre and from the bus network, very distant from Bank Quay, Central and Birchwood stations, and incapable (other than at immense cost) of becoming rail-linked, but immediately alongside the M6 and M56 motorways, is particularly questionable, and deserves a coherent public explanation.
80. It is fully accepted that, as set out in para 3.4.12, “Warrington’s economic strength and attractiveness will result in ongoing development pressure”, and the argument that “a lower level of development may reduce the ability of the Council to plan comprehensively for growth” is not being questioned. It is clearly necessary to plan for Warrington’s future strong growth and prosperity. It is the precise detail of the Updated Plan that is being questioned here.

### Strategic Planning Policies

81. The Strategic Planning Policies section commits to 14,688 new homes (816 per year) between 2021 and 2038. This includes the following on sites proposed to be removed from the Green Belt:
- South East Warrington Urban Extension, minimum of 4,200 homes, with a minimum of 2,400 in the Plan Period.
  - Fiddlers Ferry, minimum of 1,760 homes, with a minimum of 1,310 during the Plan Period.
  - Thelwall Heys, minimum of 310 homes during the Plan Period.
  - Croft, minimum of 75 homes.

- Culcheth, minimum of 200 homes.
- Hollins Green, minimum of 90 homes.
- Lymm, minimum of 306 homes.
- Winwick, minimum of 130 homes.

82. It will be noted that the SEWUE, Thelwall Heys and Lymm figures (4,200+310+306, giving a total of 4,806) of the overall total above of 7,071, meaning that no less than 68% of the new housing proposed for sites released from the Green Belt is in South and South and South-East Warrington and Lymm.

83. Given the existence of the relatively well-aligned A57, uninterrupted in its approach to Warrington by waterways, it seems surprising that Hollins Green should only be able to take 90 homes, compared with the 4,200 homes whose generated car traffic would have to be accommodated (on journeys into the town centre, General Hospital, main rail stations etc) on the A49 through Stockton Heath, the A5061 through Latchford and the regularly-interrupted crossings of both routes over the Manchester Ship Canal waterway and (in the case of the A49/Lumb Brook Road corridors) over/under the Bridgewater Canal.

84. Similarly, given the creation of the four-lane dual carriageway of the A49 between the A572 Winwick Link Road/A49 junction and the town centre at Lythgoes Lane/Orford Lane/Pinners Brow, it is surprising that only 130 new homes are proposed for Winwick. The housing allocations at Hollins Green and Winwick do not (in terms) of highway capacity into the town centre) match what exists, even without the additional complications of the Bridgewater Canal and the Manchester Ship Canal in relation to the huge South East Warrington new homes proposals.

#### Economic Growth and Development

85. The Updated Plan (in para 4.2.4), under the heading Employment Land Distribution, states “the following Employment Areas will continue to be the prime locations for industrial, warehousing, offices, distribution development and other “B class” uses”:

- Omega
- Woolston Grange.
- Appleton and Stretton Trading Estate.
- Winwick Quay.
- Birchwood Park.



- Centre Park.
- Lingley Mere.
- Gemini Westbrook.

86. The Updated Plan does not acknowledge a vital aspect of this list (in relation to the new homes proposed for South Warrington), repeatedly raised in this Response, in that Omega, Woolston Grange, Winwick Quay, Birchwood Park, Centre Park, Lingley Mere, and the major shopping concentration on the Winwick Road, and Gemini Westbrook are all on the north side of the Bridgewater Canal, and the Manchester Ship Canal (with its swing bridges at Stockton Heath and at Knutsford Road), with the obvious bottleneck effects of these waterways upon highway traffic movement.

87. All but Centre Park are also on the north side of the River Mersey. Only the Appleton/Stretton locations are accessible without having to negotiate the three waterways.

88. It is suggested that this is the central flaw in the Updated Plan. The strategy recognises the concentration of existing employment sites - in addition to the town centre, the Winwick Road retail park, the General Hospital, the two main-line rail stations - as being on the north side of the three waterways that cross Warrington south of its centre. But it then places no less than 68% of proposed new homes for sites released from the Green Belt on the south side of the three waterways. This is a recipe for serious medium-term highway traffic congestion and long-term gridlock.

89. Any faith in the new residents of the South East Warrington Urban Extension, Thelwall Heys and Lymm using public transport to access the primary employments areas of Omega, Woolston Grange, Winwick Quay, Birchwood Park, Lingley Mere and Gemini Westbrook would be completely misplaced. Most bus access would require either a bespoke direct South Warrington-north side employment-area weekday peak service, which would be difficult to operate viably as there would be little demand for it outside weekday peak hours (meaning wasteful use of vehicles/crews), or, much more probably, a change of bus at Warrington Interchange.

90. The Interchange is an excellent facility, but it would be very difficult to create a reliable timetable with tight connections on the Swiss model. Overall journey time, with interchange delay, would thus be slow and make bus travel uncompetitive compared with direct car travel. Inevitably, car travel (even with car-sharing) would greatly predominate, thus running counter to all relevant transport and environmental policies.

91. The new Employment Areas proposed in the Plan are:

- South East Warrington Employment Area (SEWEA), just under 137ha.
- Fiddlers Ferry Power Station (following demolition and redevelopment), 101ha.

92. Access to SEWEA from new homes in South East Warrington, at Thelwall Heys and at Lymm would be reasonably easy by private car, but access from both existing urban areas and from South East Warrington, Thelwall Heys and Lymm by public transport (bus) would be difficult to provide economically, as again it would have to be bespoke and would only have potential revenue viability for weekday peak journeys. The lack of off-peak and weekend potential would probably destroy any overall bus-service viability for such routes.
93. The viability situation would be made worse by the fact that services to/from any South East Warrington Employment Area would probably not be able to serve anywhere else. It might be possible to operate a Lymm-SEWEA-Warrington town centre route, but it would be indirect, and thus slow and unattractive, for Lymm-Warrington users. Any proposed new services from the South East Warrington Urban Extension, or from Thelwall Heys, to the South East Warrington Employment Area would have no obvious onward traffic objective.
94. The result of the above is that any inevitably-bespoke bus service to the South East Warrington Employment Area, even if justifiable, would probably be very sparse. This would make it unattractive to most potential users, particularly as some employment could involve shift working. The almost-inevitable outcome would be that 90%-plus travel to the South East Warrington Employment Area would be by private car, with perhaps just 10% bus and cycling. This, again, goes against all Council policy.
95. It would be interesting to ascertain the present car/bus+cycle modal split for work trips to Birchwood Science Park, although the two are not fully comparable since Birchwood is closer to housing than the South East Warrington Employment Area would be.
96. The Updated Report states in Policy DEV-4 , point 11, that “major warehousing and distribution developments will be primarily directed towards preferred locations at:
- Appleton and Stretton Trading Estates.
  - Omega
  - Woolston Grange.
  - South East Warrington Employment Area.
  - Fiddlers Ferry power station site.
97. It is pleasing that one of these, Fiddlers Ferry, is rail-connected, but disappointing that this is not highlighted or acknowledged as such. The other four locations clearly have no rail access, and their development/expansion will only serve to increase HGV and LGV movements and thus increase emissions (there is no realistic prospect of electric HGVs being successfully developed in the foreseeable future, and hydrogen HGVs are in their infancy).

98. Promoting non-rail-connected sites for distribution activities looks like a 1970s approach. And currently, in freight-movement terms, and (excepting Royal Mail and the aluminium slab traffic road-hauled from Latchford to Widnes for sending to Germany by rail) Warrington is anything but “green, and this is set to be perpetuated in the Updated Plan. The rail network seems to have played barely any part in the Plan’s thinking, particularly regarding freight distribution, and treated merely as a background presence, without passenger or freight potential.
99. Referring back to the opportunity pointed-up in this response for removing land east of the M6 and south of the Liverpool-Warrington-Manchester rail route, a little way south of Birchwood station, from the Green Belt, the Updated Plan (in Policy DEV5 - Retail and Leisure Needs) actually identifies Birchwood Centre as one of the three second-tier District Centres for retailing.
100. Re-zoning this Green Belt land for housing (with an access road over the railway) would strengthen the viability of this centre and increase its walk-in and cycle-in catchment. Otherwise, at present, the Centre is flanked on its south side, beyond the railway and peat reserve, by farmland of relatively-little visual or ecological merit. This seems an immense wasted opportunity.
101. In contrast, the Updated Plan proposes a fresh additional local retailing centre for the South East Warrington Urban Extension. It is acknowledged that some facility would be needed if the very large allocation of housing in South East Warrington went ahead. But would it not be more sensible to develop much of that housing almost adjacent to the existing centre at Birchwood, thus strengthening the latter’s viability, and render the proposed South East Warrington Urban Extension shopping centre unnecessary?

### Town Centre

102. Policy TC1 (para 6.1.5) states that the Council will support development in the town centre which strengthens its viability and vitality and promotes a greater diversity of uses, including:
- New homes.
  - Jobs growth, particularly high-value jobs.
  - Provision and attractiveness of the office market.
  - Cultural and tourism provision.
  - Existing, committed and planned public and private investment.
  - Increased use of the town centre day and night.

- Supports the town in its role as a regional transport gateway/interchange and improves linkages from the remainder of the Borough and beyond, especially by active travel modes and public transport.

103. These objectives are all warmly supported. The health of the town centre was already a source of major concern before SARS-COV-2, and the latter has dramatically expanded the market share of online retailing, partly at the expense of traditional town centres. The extent that this effect will be permanent is as yet unclear, but it is obvious that the loss of a number of retail chains from Warrington town centre has added to previous damage.

104. It is thus vital that, as part of the above strategy, that high-quality public transport access to the town centre is maintained. In Warrington's case, this mostly means buses, although there is some local rail access from stations such as Warrington West, Padgate, Birchwood and Runcorn East. Warrington is very fortunate indeed to have a relatively-excellent bus operation run by Warrington's Own Buses, complemented by Arriva and the Go-Ahead Group. However, for this to work there needs to be strenuous efforts to contain and if possible reduce traffic congestion.

105. The locating of a very large number of new houses in South Warrington would seem to directly work against this. The main routes for bus services are along the A49 through Stockton Heath High Street and along the A5061 through Grappenhall and Latchford. Both of these locations, as already noted, suffer from significant highway congestion, not only during the morning and evening peaks but at some other times during the day.

106. Adding the highway-space demands of a further 4,806 new houses seems certain to aggravate this congestion, and thus damage the viability of the bus network. This, in turn, will damage access to the town centre and directly work against Policy TC1.

107. Increased congestion in Stockton Heath High Street, A5061 through Grappenhall, and Latchford, will not be able to be alleviated by traffic management measures such as bus priorities. There is an existing inbound bus lane on the A49 Wilderspool Causeway, but there is insufficient space to create an outbound lane all the way, and of course no space to create one in either direction in Stockton Heath High Street or across Stockton Heath swing bridge or on its northern approach.

108. Similarly, although there is an inbound bus lane on the A5061 Knutsford Road on the approach to Bridgefoot, and this could be extended back to Black Bear bridge and an outbound bus lane created to match it, there would be no scope to extend bus lanes through Latchford or along the A50 through Grappenhall.

109. In short, the ideal of the major residential expansion of South and South East Warrington is fundamentally incompatible with supporting the town centre with good-quality bus access from the south and south-east of the town, and maintaining that access reliably. If bus services become unreliable, people will not use them. If the town

centre becomes difficult to travel into, people will not travel into it, or only at a minimal frequency. One could argue that this situation has been temporarily part-reached already for quite different reasons - the pandemic's effect and the post-lockdown spike in car traffic worsening congestion, compounded by town-centre retailing decline.

110. Para 6.1.14 rightly refers to the opportunities for Warrington that will flow from Bank Quay station becoming an HS2 hub. Again, the viability and attractiveness of this would be damaged by the increased congestion on the A49 and A5061 corridors that would flow from the massive expansion of South Warrington, which alone could ultimately put a further 6,000-8,000 cars on South Warrington's highway network, plus the further major highway impact of the South East Warrington Employment Area proposal on the A5061 in particular.

### Sustainable Travel and Transport

111. Para 7.1.1 of the Plan acknowledges that there are many locations where there is significant traffic congestion. Para 7.1.2 goes on to argue that "the proposed level of housing and employment growth across the Borough over the plan period means that there is a critical need to address (the) dependency on the private car.

112. The Plan goes on to argue, rightly, in favour of increasing the use of public transport, cycling and walking and to exploit opportunities to minimise the need for travel by providing local facilities and services alongside new development. The Plan's transport principles as stated, for new development, include:

- Located in sustainable and accessible locations, or locations that can be made sustainable and accessible.
- Ensure priority is given to walking, cycling and public transport, with reducing the need for travel by private car.
- Support proposals that reduce trips by single-occupancy cars.
- Consider demand management measures, including the effective allocation of roadspace in favour of public transport, pedestrians and cyclists.
- Mitigate impacts or improve the performance of Warrington's transport network.
- Ensure traffic generated (has) no adverse impact on the local community.
- Develop appropriate road, rail and water freight transport routes and associated multimodal freight transport facilities.

113. It is clear that the plan for a very large number of new homes proposed for South Warrington, whilst they could be provided with facilities to encourage walking, cycling and public transport, will struggle to actually implement a worthwhile long-term modal share for these sustainable modes. Whilst the above-listed principles are strongly

supported, there is clearly no means of actually ensuring that the thousands of new residents of South Warrington would in reality adopt bus travel as their mode of choice. Indeed, if they reflected the modal choice of existing residents - and there is no evidence to suggest that they would not - bus use would only be likely to appeal to a very small minority. Many of the references to buses in the Updated Plan are thus highly optimistic “greenwash”.

114. It is harder to predict the precise likely use of walking and cycling, but clearly the new homes developments across South Warrington would be well beyond normal convenient walking distance from town centre’s retailing, employment and leisure activities, or from key facilities such as Warrington General Hospital and the main line rail stations, let alone employment areas such as Woolston Grange and Birchwood Science Park.
115. Whilst there is more scope for cycling - and Warrington itself is relatively flat - much of these new homes will be on a hill, as already noted, which will make cycling to Stockton Heath centre or the town centre partly-unattractive. This will be made worse by busy traffic flows, such as on the A49 and through Latchford.
116. Cycling is thus likely to appeal to only an enthusiastic minority, probably fit males under 40. This is not to say that excellent cycling facilities should not be created - they should - but to point out that cycling, like bus use, will only be likely to appeal to a small minority. By far the predominant mode will be the car, particularly during winter months and in indifferent weather.
117. The proposals for up to 4,806 new homes across South Warrington therefore does not square with the stated Council “General Transport Principles”.

#### South East Warrington Employment Area

118. In relation to proposed employment at the South East Warrington Employment Area (SEWEA), with its focus on logistics, there is near-total discord between the proposal and the General Transport Principles, and it is really remarkable that such a scheme could be put forward against such a policy backdrop. In particular:
- By locating the SEWEA at the junction of the M6 and M56, the proposal is very remote indeed from the rail system in terms of both passenger (employee) and freight access, making rail irrelevant. The site is of course also inaccessible by waterway.
  - The site could be made accessible by bus, as discussed earlier, but this would be unlikely to be sustainable financially, other than by providing peak-hour commuters with a basic peak-only bus link. The costs of such a link might be borne by developers in the short term, but would be unlikely to have a long-term secure future, and would be most unlikely to be self-funding due to very poor utilisation outside peak hours.
  - It would be possible to create cycle access, but walk access would be unattractive from almost anywhere.

- Any suggestion that the proposal would “reduce the need to travel by private car” is clearly not remotely credible. The scheme and its location would obviously generate a very large amount of car travel.
- The scheme would certainly impact adversely upon other parts of the Warrington transport network. Generated traffic would be extremely likely to affect the A5061 through Grappenhall, A5061 Latchford and Knutsford Road, Ackers Road, the A56 Chester Road/Grappenhall Road and Stockton Heath centre, with lesser adverse effects over a much wider area.
- Adverse effects from raise traffic levels would include difficulties for pedestrians (particularly schoolchildren, older people and vulnerable groups such as people with mobility difficulties) crossing roads at unsignalled crossings, adverse impacts for cyclists, greater congestion delaying buses, noise/severance and other negative impacts. These would particularly apply at peak times, but also to some extent at other times due to generally-elevated traffic levels.
- There would also be adverse effects upon car drivers, including congestion delays, difficulties in emerging from side-roads at unsignalled junctions (already a problem along the A50 through Grappenhall) and difficulties for householders accessing driveways at properties on these roads.

119. To summarise, the South East Warrington Employment Area proposal is clearly in direct conflict with the Council’s own stated policies, and on a wide range of grounds. It is inexplicable that it has been proposed at all.

120. It is also important to set the SEWEA proposal, in terms of freight movement - which it clearly is closely-related to - in the context of the national transport policy framework.

121. In the National Policy Statement for National Networks, Department for Transport, December 2014, under “Importance of strategic rail freight interchanges”, p20, it states:

- (para 2.45) “The users and buyers of warehousing and distribution services are increasingly looking to integrate rail freight.....This requires the logistics industry to develop new facilities that need to be located alongside the major rail routes.....” (my underlining).
- (para 2.47) A network of SRFIs (Strategic Rail Freight Interchanges) is a key element in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth (my underlining) and meeting the changing needs of the logistics industry.....SRFIs also play an important role in reducing trip mileage of freight movements on the national and local road networks.”

122. In terms of freight distributional activities, allowing the South East Warrington Employment Area proposal to proceed completely contradicts the above philosophy, which has not been reversed since it was formulated.

123. It is also relevant to examine current Government policy for freight in relation to rail, under Strategic Rail Freight Interchanges (SRFIs). Under "Government's policy for addressing need for SRFIs", p22:

- (para 2.53) "The Government's vision for transport is for a low carbon sustainable transport system that is an engine for economic growth.....The transfer of freight from road to rail has an important part to play in a low carbon economy, and in helping to address climate change." (again, my underlining).
- (para 2.55) "Even with significant future improvements and enhancements to the Strategic Road Network, the forecast growth in freight demand would lead to increased congestion, both on the road network and at our ports, together with a continued increase in transport carbon emissions."

124. In "The Logistics Growth Review - Connecting People With Goods", Department for Transport", November 2011, it is stated that:

- (para 6) It is extremely important that more modern, high specification logistics buildings and intermodal terminals in the form of Rail Freight Interchanges are now approved and built in order to give occupiers the opportunity to actively move more goods by rail." (again, my underlining).

125. In the "Rail Freight Strategy - Moving Britain Ahead", Department for Transport, September 2016, Executive Summary:

- para 1) "Each tonne of freight transported by rail reduces.....UK emissions as well as building a stronger economy and improving safety by reducing lorry miles."
- (para 2) "Government is committed to ensuring that transport plays a full part in delivering the economy-wide emissions reductions needed to meet this target".
- (para 3): "In 2014, HGVs were responsible for 17% of total UK transport emissions. Shifting more freight from road to rail therefore has the potential to make a real contribution to meeting the UK's emission reduction targets".
- "The key constraint to unlocking potential in this sector (is the) availability/construction of suitable rail-connected terminal facilities, including SRFIs (strategic rail freight interchanges)." (my underlining).

126. In the Transport for the North "Enhanced Freight and Logistics Analysis Report", 2018, under Section 4, "Freight and Logistics in the North of England", it states:



- (para 4.1): “There are a) wealth of freight assets located in the North, which underpin a strong multimodal freight capability. These include three Strategic Rail Freight Interchanges (intermodal terminals) at Ditton, Wakefield and Selby (and) five further intermodal terminals at Trafford Park, Leeds, Garston, Doncaster and Wilton.

127. It is very notable that this list does not include any reference to Warrington. This is all the more extraordinary given Warrington’s major role as a logistics base. It suggests a sustained inaction on Warrington Borough Council’s’ part to embrace the potential of rail freight, in the face of Government policy.

128. 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.”

129. The 2021 Department for Transport policy paper “Decarbonising Transport - A Better, Greener Britain, states:

- “We (the Government) will support and encourage modal shift of freight from road to more sustainable alternatives, such as rail, cargo-bike and inland waterways.....HS2 will release a significant amount of spare capacity on the.....West Coast Main Line, some of which could create opportunities for freight operators to grow and develop.”
- “The modal shift of freight from road to rail would not only lead to a reduction in GHG levels, but also reduce congestion and noise pollution.”

130. Previously, the designation in January 2015 of the National Networks National Policy Statement “provided the Planning Inspectorate with a clear statement of Government Policy on the development of Strategic Rail Freight Interchanges (SRFIs).” The same paper stated: “Each tonne of freight transported by rail reduces carbon emissions by 76% compared to road, and each freight train removes 43 to 76 lotrries from the road - meaning rail freight has real potential to contribute to reducing UK emissions as well as building a stronger economy and improving safet by reducing lorry miles.”

131. All of the above relevant policies, which as far as can be ascertained are still valid under the present Government and under Transport for the North, suggest that the purely road-served South East Warrington Employment Area represents a development that is diametrically opposed not only to the Council’s own policies but also to Government and Transport for the North’s policy framework. It is accepted that not all employment at the Council’s proposed site would be distribution-related, but clearly

much of it would be, and indeed this is openly recognised by Warrington Borough Council in the Updated Plan.

132. The Updated Plan goes on to set out that “all major development proposals” (which presumably include both the South and South-East Warrington housing proposals and the South East Warrington Employment Area) “.....that are likely to generate significant movement are accompanied by a Transport Assessment and a Travel Plan”. Unfortunately, undertaking an assessment and formulating a plan does not, in itself, ensure that a development does not result in an adverse outcome.
133. It is difficult to see how a Travel Plan for either the South and South-East Warrington housing proposals or the South East Warrington Employment Area could avoid the outcome being a major increase in private car and HGV traffic on local roads, with attendant increases in congestion. It should be noted that congestion increases disproportionately with increased traffic, for example due to junction-blocking - it is not a straight linear relationship.
134. The outcome would be likely to be particularly adverse for the very groups that the Council states are its priority - pedestrians, cyclists and bus users - through delay, intimidation and possibly accidents. Intensification of congestion levels would also disbenefit older drivers, who would find it harder to compete assertively for roadspace.

#### Transport Safeguarding

135. Section 7.2 of the Updated Plan sets out the need to safeguard land for transport improvements, to ensure that it is protected from development. It lists (under Policy INF2) the following schemes for which land will be safeguarded:
- The Bridgefoot Link (including the “blue bridge” close to the present bus garage and linking across to Centre Park and Bank Quay Station.
  - A new (presumably this means “new alignment) or replacement (taken to mean “same alignment”) high level crossing of the Manchester Ship Canal between Ackers Road (Stockton Heath) and Station Road, Latchford.
  - Warrington East Multi-Modal Corridor Improvement (Long Lane Diversion), connecting Birchwood to Central Warrington.
  - Warrington Western Link, connecting the A56 at Walton with the A57 Sankey Way.
136. The Centre Park/Bank Quay link would be likely to intensify highway traffic flows past Bank Quay station, further isolating it from the town centre for rail passengers. The increased importance for Bank Quay station post-HS2 would make increasing the traffic flow immediately in front of the station seem even more disadvantageous.

137. A replacement bridge linking Ackers Road with Station Road would presumably incorporate a weight capability of over 44 tonnes. This might at first seem advantageous, as it would give HGVs a new route into Warrington town centre when the Knutsford Road or Stockton Heath swing bridges were open to shipping. However, it would encourage the greatly-increased use of the very narrow Hunts Lane, of the winding Ackers Road, and of Grappenhall Road (on the south side) and Station Road and Wash Lane (on the north side) by many HGVs to access the new bridge. Newly-introducing additional flows of HGVs to residential roads does not match Council policies, specifically “Ensure traffic generated has no adverse impact on the local community” (see earlier “Principles”).
138. Even if a new cut-off road was built at the north end of the new bridge to link it to the A5061 without using Wash Lane and Station Road, the insoluble problems for Hunts Lane, Ackers Road and Grappenhall Road would remain.
139. The Warrington Western Link would primarily be useful (obviously) to traffic on the A56 south-west corridor. It would be unlikely to have any significant material benefit for traffic (both car and HGV) in South Warrington on the A49/A559 corridor from the south and even more so on the A5061/A56 corridor from the south-east and east.
140. The proposed Western Link would thus have almost no benefit, other than reduced town-centre congestion at Bridgefoot/Wilson Patten Street, for the very areas where developments in South Warrington are being proposed, the major South and South East Warrington housing proposals and the massive South East Warrington Employment Area near the junction of the M6/M56.
141. These disadvantages call into question why the Council is putting most of its investment eggs into the Western Link basket, as the high expenditure clearly does not address the locations of development. This is not to say that the Western Link has no benefits - it could be argued that it does, for south-west Warrington. But there is a clear mismatch between proposed developments (in terms of housing and employment) and this major proposed scheme.
142. The Western Link at its northern end may also exacerbate congestion on the Sankey Way, as intensified traffic flows and turning movements at the intersection of the A57 Sankey Way and Cromwell Avenue could be expected to increase queueing on both routes. Any negative outcomes have to be set against the benefits of the scheme. Promoting south-west to north traffic flows across Warrington via Cromwell Avenue or via Lovely Lane would also have negative effects for vehicle traffic, public transport, cyclists and pedestrians.
143. It is also crucial to acknowledge that each fresh investment in schemes such as the Western Link in facilitating car-traffic flows - however worthwhile for that local specific flow at the time - has a longer-term adverse consequence in that it further cements-in the future dominance of the private car as the transport of first choice.

## Community Facilities

144. It is very pleasing that Policy INF4 recognises that any new site for a new Warrington Hospital “must be in a location that provides ease of access for residents from across the Borough and be well served by public transport.” It is hoped that this means that a remote out-of-town site that will be relatively-difficult to reach by bus will be avoided, but it is recognised that finding a large site well served (as opposed to minimally-served) by public transport may prove extremely challenging. The present Lovely Lane site is reasonably-well-served by bus.

### Delivering Infrastructure

145. It is noted (Policy INF5, para 7.5.3) that there is a welcome commitment to providing infrastructure that is operational no later than the appropriate phase of development for which it is needed. The Updated Plan lists a number of aspects that are to be funded by planning contributions, including minor transport improvements, walking and cycling.

146. However, it is a matter of concern that, whilst worthwhile infrastructure for cars, cycling and walking can be “baked into” the proposed new developments, this is not the case for bus transport, the predominant local public transport mode. A developer may be made to commit funding to supporting new or improved bus services for three, or perhaps even five, years. But there is no physical infrastructure (other perhaps than bus shelters) that can be guaranteed to endure for, say, ten or twenty years.

147. New developer-funded bus services may therefore prove to be anything but permanent, and subject to reduction or complete disappearance (starting with the loss of evening and Sunday services) within a few years. The development and transport strategies need to recognise this reality in the Updated Plan. An Updated Plan that placed, say, medium or high density settlements around railway stations would be a significantly more sure-footed approach to securing lasting convenient public transport provision, though, even then, rail service frequencies cannot be fully guaranteed, as has recently been proved at Warrington West.

### Warrington’s Places

148. Under Objective W5, para 8.1.4, the Updated Plan recognises the importance of Inner Warrington, including Latchford East and Latchford West. It is noted in the Updated Plan that development in these areas will be required to promote sustainable transport measures, assumed to cover public transport, cycling and walking in this instance.

149. It should be a matter of concern that the major residential developments planned for South Warrington, Thelwall Heys and Lymm, and the very large development planned for the South East Warrington Employment Area, can be expected to significantly adversely affect Latchford, both in terms of traffic through Latchford village centre and in terms of increased numbers of cars and HGVs on the A50 through Grappenhall, the A5061 Knutsford Road and the A50 Kingsway South. Increased traffic

volumes - an inevitable outcome from the large scale of both developments and their ability to generate traffic - will make it harder for buses to be routed punctually through the area, for cyclists to use these roads, for pedestrians to cross them, and for drivers of cars to emerge from side-roads.

150. In terms of sustainable access, it is notable that there are no bus services whatever (other than a couple of journeys a day from Lymm on route 47) between significant parts of Warrington, such as Stockton Heath, Grappenhall, Thelwall and Lymm, and the important leisure amenity of Victoria Park. Cycling through Latchford centre's gyratory system is unpleasant, and the Park is beyond convenient walking distance from these areas. Further promotion of Victoria Park, very desirable in itself, therefore appears set to draw additional car traffic through Latchford centre unless significant enhancement of the bus network can be secured viably.
151. Similarly, there are no direct bus services between Lymm, Thelwall, Grappenhall, Appleton, the eastern side of Stockton Heath and the Walton Hall Estate, though there is a bus service (62) between Stockton Heath village centre and the facility, and an Arriva bus service along the A5060 Chester Road that calls there. Cycle access to the estate has been partially improved, but the facility is beyond convenient walking distance of most of South Warrington. Again, promotion of the facility seems set to result in increased car traffic unless there is significant enhancement of the bus network.
152. There are no direct bus services between South Warrington and Gulliver's World, and again any promotion of the facility appears set to generate additional private car movements. Expanding the residential population of South and South-East Warrington will heighten this process.
153. The importance of Policy DC3, recognising the value of green infrastructure and the biodiversity offered by key sites around Warrington is supported. However, it is suggested that this policy, if applied over-rigidly (but with the best of intentions) can carry a cost in that development can then find itself redirected by default onto good agricultural land.
154. Such agricultural land (as controversially now identified for development in South and South-East Warrington) may lack the status of high-profile key sites, and the protection offered to the latter, but still makes a positive contribution to the natural landscape. It is a source of acute concern that Green Belt land in South and South East Warrington is to be given up for housing - however much that new housing is needed - because other Green Belt land that might make greater overall strategic sense to relinquish is being retained because it enjoys an elevated level of protection such as "peat reserve" or "mineral reserve" or "needed to create a gap between Warrington and Widnes".
155. A specific instance that has been raised earlier in this response is the land immediately adjacent to Birchwood rail station (Woolston Moss). The land does not offer any remarkable amenity features, is inaccessible to the local population and only offers

agricultural value, but of course is directly adjacent to a well-served main-line station and extremely close to bus services and one of the three important District retail facilities.

156. None of those factors are present on, for example, the land immediately south of Stockton Lane, Grappenhall, that is set to be developed for housing. Overall, therefore, the retention of Woolston Moss for agriculture but the loss of the Stockton Lane fields, which are visually pleasing and are very close to (and thus seen by) an existing population seems decidedly sub-optimal and, standing back, hard to defend rationally.

## Main Development Areas and Site Allocations

### Warrington Waterfront

157. It is very pleasing to note in Section 10.1 that Warrington Waterfront will be developed as a new urban quarter of Warrington, and that this will provide up to 1,335 new homes, including 1,070 in the Plan Period, with homes built at a relatively high density. It is hoped that convenient access to public transport will be created, backed by very good cycling and walking facilities. Walking facilities must ensure that pedestrians feel safe and secure, notably in the hours of darkness. The expectations as to the precise range of “convenient walking distance” should not be unrealistic.
158. It is noted that “no development will be permitted until funding has been secured and a programme of delivery has been confirmed for the Western Link”. It is very far from clear why this should be, and no explanation is offered in the Updated Plan. It should surely be possible to deliver much, or even most, of the new urban quarter without the Western Link. Connecting the two schemes inextricably together seems artificial and contrived.

### South East Warrington Urban Extension

159. Para 10.2.1 asserts that the South East Warrington Urban Extension will be “sustainable”, though the veracity of this claim in terms of public transport, cycling and walking is clearly left open to dispute. As discussed earlier, it is perfectly possible to build-into a new development a network of attractive cycling and walking routes, though the continuity of those routes once the cyclist or walker leaves the new development is often more questionable.
160. For example, a cycle route (or a network of routes) through the SEWUE could be provided from the outset. But this would not necessarily enable the cyclist - and bear in mind that for part of the year, weekday peak travel is undertaken in the hours of dusk or darkness - to cycle safely to and from work.
161. For example, a cyclist leaving the SEWUE and working in the town centre would have to use a road used by general motorised traffic (such as Lumb Brook Road) to negotiate the Bridgewater Canal. They would then have to share a route with motorised traffic to pass over the Manchester Ship Canal at either the Cantilever Bridge (steep

climb) or the Stockton Heath or Knutsford Road swing bridges. They would then have to negotiate either the busy Wilderspool Causeway/Greenalls Avenue junction or the Latchford gyratory system. A safer passage along the A49 Wilderspool Causeway or the A5061 Knutsford Road could be secured through cycle lanes or shared bus lanes. But the journey would culminate in (from the A49) the roundabout by St James Church and the Bridgefoot gyratory or, in the case of the A5061 the Bridgefoot gyratory alone.

162. A cycle journey to further afield, such as to Warrington General Hospital or to the retailing area on the A49 Winwick Road, would be even more challenging.
163. This is not to decry the provision of local cycle priorities in any proposed SEWUE, merely to point out that such facilities do not constitute a proper network. It will be the least-attractive aspects of the theoretical cycle journey that dictate whether cycling is a realistic option at all.
164. The above argument will apply to shorter, more localised, journeys in the case of vulnerable road users such as schoolchildren.
165. There are similar cautions in relation to bus travel. Warrington is very fortunate to have an excellent and award-winning bus operator, Warrington's Own Buses. The operator has tried hard in recent years to secure greater levels of patronage - setting aside the pandemic - by promoting the successful Cheshire Cat bus network and making the bus an attractive mode. But, in practice, there are significant problems in encouraging bus use, principally due to traffic congestion and consequent late running.
166. The assertion in para 10.2.1 that "the Urban Extension will be well served by new community infrastructure and a network of sustainable transport links maximising travel by walking, cycling and public transport therefore has to be seen in these contexts. It suggests that, despite the best of intentions and a determined effort by the Council, bus operators and developers to encourage sustainable transport use, actual use in practice of these modes, following construction of the Urban Extension is likely to prove deeply disappointing.
167. Ultimately, residents cannot be forced to use sustainable modes. Bus travel is offputting to some sectors of the community, particularly if waiting conditions (including in poor weather) are poor or reliability unpredictable. Cycling and walking are effectively free, but bus travel can feel expensive when it requires cash up-front. Once purchased, taxed, insured and fuelled, and available on the driveway, for most people a car becomes the mode of first choice without further thought. Electric cars will reduce the future perceived fuel and environmental cost, tilting the balance even further in favour of the car. Cheap leasing deals are a further incentive to own and use the private car.
168. The overall result, as remarked previously, is highly-likely to be that the South East Warrington Urban Extension and other associated developments in South Warrington put a further 6,000-8,000 cars on South Warrington's roads.

169. The statement that (para 10.2.7) “the development (of the SEWUE) will be supported by a new strategic link connecting the allocation sites with the A49” (etc) and “the development will also contribute to wider transport mitigation measures to offset the impact on Junction 10 of the M56 and Junction 20 of the M6” demonstrates that the Council clearly expects the South East Warrington Urban Extension to become a major generator of additional private car traffic, and that the role of sustainable modes such as buses, cycling and walking will indeed be insignificant.
170. It is also noted that (para 10.2.8) Warrington has a “wider vision” as set out in the Local Transport Plan LTP4, which “seeks to deliver a future Mass Transit public transport scheme and a possible further crossing of the Ship Canal.” However, this is just that - a vision. The Mass Transit scheme seems likely from press reports) to be buses running on bus priority routes, possibly with lateral guidewheels over some sections as on the successful Leigh Busway, rather than a true Rapid Transit system as in Blackpool, Manchester, Sheffield and Croydon. But there is absolutely no assurance to date of any external funding from Government for any such scheme, which is still at the outline-concept stage, as was pointed out in Appendix 1 of this response.
171. Similarly, the possibility of a further Ship Canal high level crossing is purely a concept. Funding for such a proposal with add-ons (approach roads) would probably run to £200m-plus, and essential Central Government support would mean that any such scheme would have to compete with numerous others elsewhere. Any suggestion that the scheme was needed to deal with peak car-commuter suggestion would probably place it firmly in the low-priority list from the outset.
172. Warrington’s vibrant local economy would also probably deny it access to levelling-up-type funds that would rightly be primarily targeted at areas of deprivation such as Blackpool, East Lancashire or the inner areas of the North West’s large cities.
173. Also, on a point of principle, it is arguably highly misleading to hint at the prospect of further major infrastructure schemes in the Updated Plan when those schemes are not even at the submission for funds stage. It raises false hopes, and seems designed to encourage support for the Plan on the basis of major infrastructure-investment schemes that may be little more than “ideas”. The Updated Plan should be grounded upon what is already specifically planned and awaiting funding, not on optimistic future aspirations.
174. The statement (para 10.2.9) that “the development of the South East Warrington Urban Extension will ensure the permanence of the revised Green Belt boundaries” is highly misleading. The Council said that last time. It would be perfectly possible to preserve some or even most parts of the Green Belt in South Warrington that are currently slated for residential development. It is the Updated Plan that threatens those parts of the Green Belt. Suggesting that, if those parts of the Green Belt could be sacrificed, then the remainder might be safe, is manipulative.
175. Para 10.2.13 refers to “a phasing strategy and trajectory (for the South East Warrington Urban Extension), which identifies when key infrastructure is required, how



it will be funded and the mechanism for delivery.” But, as outlined earlier in this response, there is no evidence that all the infrastructure necessary to deal with the elevated traffic levels that will flow from the SEWUE (and the South East Warrington Employment Area) will actually be secured. Funding will not be purely a matter for developers and the Council, but will involve Central Government, and will thus be uncertain.

176. Furthermore, again as noted earlier, some congestion aspects will prove extremely difficult or impossible to solve, such as Stockton Heath high street, Latchford centre and the swing bridges.

177. In para 10.2.15, under Policy MD2, South East Warrington Urban Extension, Key Land Use and Infrastructure Requirements, it states that the Urban Extension (with a minimum of 4,200 homes of which 2,400 will be in the Plan Period) will be supported by a wide range of infrastructure. It goes on to list various elements, including item (j), “A comprehensive package of transport improvements”.

178. The tables then go on to list the following specifics in relation to transport:

- Delivery of a highway scheme to relieve the A49 London Road/B5356 Stretton Road junction.
- A green infrastructure network (which will help cycling and walking), and improved cycling and walking routes - this is very welcome.
- “Provide public transport enhancements to connect the new community with the South East Warrington Employment Area, Stockton Heath, Warrington town centre and employment opportunities within the wider Warrington area”.

179. But, as has been repeatedly pointed out earlier in this Response, the Council cannot guarantee to actually deliver on this. This is because bus services (there are no rail services in South Warrington) are either commercial or subsidised. There is absolutely no guarantee that new bus services through what is likely to be a reasonably-affluent area (the proposed South East Warrington Urban Extension) can be operated commercially. It will critically depend upon demand.

180. It is possible (but still not guaranteed certain) that a daytime half-hourly bus service could operate through the various parts of the SEWUE that were appropriate to serve (in other words, along spine roads, with residents not living on those roads having a short walk to a bus stop). It is even just possible that frequencies above this (say every 15-20 minutes) could be provided commercially. But that would be a matter for commercial bus operators - not the Council.

181. The Council has no powers to order bus operators to run loss-making services, unless these are let on a tendered (subsidised) basis. It would be almost certainly the case that services outside the 0700-1900 Monday to Saturday period would be non-commercial. In theory, an operator could provide them, but it would require internal

cross-subsidy from other, more profitable, routes, and operators may well decide not to do this.

182. It would be very possible to subsidise non-commercial bus services in the evenings and on Sundays, as mentioned previously. Normally there would be two sources of revenue support, the developer(s) and the Council. The developer(s) may be obliged through Section 106 grants to support non-commercial services, but (as stated earlier) these would only be likely to cover the early years of services. The Council could subsidise non-commercial services, either from the outset or taking over later from the developer contributions when these phased out. But there is again absolutely no guarantee that the Council would have the funds to do this.
183. The recent history of local government support for non-commercial bus services, outside the Passenger Transport Authority areas, has been one of near-continuous contraction, with attendant effects upon service provision. It would be extremely surprising if there were good long-term prospects for Warrington Borough Council to be able to subsidise loss-making evening and Sunday services through the SEWUE area.
184. To summarise, the statement that Warrington Borough Council will “provide public transport enhancements” (indefinitely, or following cessation of developer support) needs to be heavily qualified. It is probable, but not certain, that daytime services, though of a limited frequency, could be provided commercially. It is extremely unlikely that evening and Sunday services would be provided commercially, and very far from certain that they could be provided even on a subsidised basis.
185. What the above means is that public transport modal share of trips to/from the South East Warrington Urban Extension is likely to be very modest during the 0700-1900 Monday to Saturday periods, and negligibly small during evenings and on Sundays. In this, it would be no different to most other parts of Warrington or to other towns.
186. The consequence is, as previously noted, that the SEWUE will be expected to generate large volumes of private car traffic, which will impact adversely on the surrounding area. The conversion of Green Belt to housing in a location where it will be very difficult to cope with significant increases in car traffic will result in increased congestion and severance. To summarise, it will not be possible to prevent new residents owning and using private cars. It will not be possible to force residents to use public transport. It will not be possible to force bus operators to provide new but loss-making services. It will be very unlikely that the Council will have the resources to financially-underpin such services, and if such resources were targeted on the SEWUE there would be a justifiable outcry from other parts of Warrington that those areas, too, deserved equal favour.
187. In terms of public transport, the statement in para 10.7.18 of the Updated Plan that “its (the SEWUE’s) location will also ensure good access to the surrounding urban area including Grappenhall, Stockton Heath District Centre, Warrington town centre and

the proposed South East Warrington Employment Area” needs to be seen in the context of the above paragraphs.

### Fiddlers Ferry

188. The Updated Plan, as noted, will deliver around 1,800 homes, with 1,300 being delivered in the Plan Period. The recognition that this brownfield site can be made available for housing after demolition of the former power station has emerged after previous consultation over the earlier Draft Plan, and is very welcome.
189. The area lies west of the Fiddler’s Ferry Golf Club (there are various spellings of the word “Fiddlers”, including with one “d”) and south of the A562 road, which feeds into the A557 to the west at Widnes and becomes a dual carriageway to the east at Penketh. Further north, the A5080 feeds into the A557 in North Widnes at Lunt Bridge and the M62 at junction 6, and at the east end, the A562 at Penketh. Along the southern perimeter of the area, on the north bank of the River Mersey, runs the currently little-used Ditton Junction (Widnes) to Arpley (Warrington) double-track rail route. The route formerly fed the power station with block coal trains. There are no current passenger services or stations.
190. It is striking that the Fiddlers Ferry area enjoys a relatively good local road network compared with South Warrington. There is a marked contrast between the availability of road links to Widnes, to Runcorn (via the Silver Jubilee and Mersey Gateway bridges), to the M62 and Liverpool, and to Warrington via the Sankey Way. In addition, there is the medium-term opportunity for the area to be rail-connected via a new Fiddlers Ferry station if a stopping passenger service was introduced on the Lime Street-Ditton-Warrington route. The reclamation of the fly-ash lagoons (in the second phase of development) would helpfully put the station in the middle of the new housing.
191. In contrast, although the South East Warrington Urban Extension, with a proposed 4,200 homes, would have southwards/eastwards links via existing or new roads to junction 20 of the M6 and junctions 10 and 9 of the M56, travel prospects northwards would unavoidably be fraught, with traffic having to negotiate the Bridgewater Canal, the Manchester Ship Canal and the River Mersey to reach Warrington town centre and key destinations such as Warrington General Hospital, Bank Quay intercity station (soon to be an HS2 hub) and Central regional-express station.
192. There is thus a stark contrast, and mismatch, between the scale of development in relation to its surrounding transport infrastructure at Fiddlers Ferry compared with the much greater scale of development and inherently significantly-inferior transport infrastructure at South East and South Warrington. It is difficult to detect any rational explanation in the Updated Plan for this, other than the presence of Homes England at the latter.
193. It is not part of the Updated Plan to add further areas for housing to the Fiddlers Ferry brownfield development, but, as noted earlier, it would seem possible to do so.

Because the overall area lies between Widnes and Warrington, there would be the opportunity to serve a significantly-larger number of new houses, extending northwards, north of the A562 Widnes Road and as far north (or even beyond) the A5080 Farnworth Road.

194. If new development was to extend as far north as the A5080 Farnworth Road, there would be an opportunity to establish a new rail station where the A5080 intersects with the existing passenger-served Liverpool-Warrington Central-Manchester line, at the Halton/Warrington borough boundary. This would not only be very convenient for any new development but would also offer a useful park-and-ride facility for commuting towards Liverpool for the Penketh area, and for commuting towards Warrington, Birchwood and Manchester for the Barrows Green area. A half-hourly service would be possible, particularly if Merseyrail services are extended to Warrington using bi-mode Class 777 trains.
195. It is recognised that such developments would entail the removal of land from the Green Belt. This would be regrettable, but it would be compensated for hectare-for-hectare by the non-removal of land from the Green Belt in South Warrington, so the overall effect would be neutral.
196. The key advantage of substituting development at Fiddlers Ferry and the lands northwards would be that such developments would be served by a road network that was not bisected by the Bridgewater Canal, the Manchester Ship Canal (with its swing bridges) and the River Mersey. There would be the opportunity to serve the area with viable interurban bus services running between Widnes (and Liverpool) and Warrington, and the opportunities to offer convenient rail access through new stations on both the Fiddlers Ferry line and the existing Liverpool-Warrington Central-Manchester line where the A5080 intersects with it.
197. The importance of facilitating convenient and attractive future public transport access to the major centres of Liverpool and Manchester needs to be acknowledged in the Updated Plan. There seems to be an antipathy towards commuting to Liverpool and Manchester in the Plan that needs to recognise the reality that new residents will work where they want to, and that commuting to Manchester from any SEWUE will risk being via the already-stressed M56, and commuting to Liverpool will be via the A57 and M62. Public transport needs to become the first-choice option for commuting to both cities. At present, it is the M62, M602 and M56.
198. Some road improvements (such as the dualling of the A562 Widnes Road) would be necessary at Fiddlers Ferry, plus junction improvements to cope with turning-movements and peak flows, but overall there are very significant transport advantages that the South East Warrington Urban Extension proposal completely lacks.
199. What is being suggested here is that planning starts with an assessment of the transport network, in terms of existing road capacity and rail routes, then develops from that, rather than starting by choosing inherited land already conveniently in public ownership (the SEWUE) and then struggling to deliver an inherently-undeliverable

sustainable transport network. If the Updated Plan misjudges this, the whole of South Warrington will be afflicted by the consequences, indefinitely.

### Thelwall Heys

200. The Updated Plan (para 10.5.1) proposes the removal of land from the Green Belt at Thelwall Heys, in an area between the A50 (the road towards junction 20 of the M6, the A56 Chester Road, the Bridgewater Canal and Cliff Lane, and the construction of a minimum of 300 homes.
201. The Updated Plan proposes that “a package of transport improvements will be required to support the development”. This would include:
- Provision of cycling and walking routes within the site, with developer contributions.
  - “Other necessary network improvements” (unspecified, but to be identified by a future Transport Assessment).
202. For cycling routes at Thelwall Heys, whilst they will connect with some other cycle/walking routes, they will struggle to offer safe cycling routes to, say, Warrington town centre and rail stations, or to other employment concentrations such as Birchwood. As already noted, cyclists accessing the town centre would have to deal with the hazardous Latchford and Bridgefoot gyratory systems, plus heavily-trafficked routes such as through Grappenhall. In safety terms, cycling will be uncertain in parts.
203. For bus services (there is no rail access) it is stated that “good accessibility to public transport services should be provided by ensuring that the bus routes and bus stops on Knutsford Road and Stockport Road are accessible for pedestrians through safe and attractive footpath links”.
204. In fact, there are currently no bus stops on the relevant sections of either the A56 Knutsford Road (east of the A50/A5061/A56 junction) or the A56 Stockport Road. There are stops on Knutsford Road west of the A50/A5061/A56 junction (route 6) but the link with the town centre is indirect. There are stops on Thelwall New Road (routes 5/5A), but these are inconveniently distant from the proposed development. There is an existing bus service along Weaste Lane (route 47), but this is limited to only a couple of journeys a day, and is not conveniently-accessible from the site.
205. The Thelwall Heys development site thus does not enjoy any convenient public transport access. It would be possible to divert routes 5/5A from Thelwall New Road to operate along Stockport Road, but this would adversely affect existing users in Thelwall. It would be possible to extend route 6 along Stockport Road, but as noted this does not provide direct access to the town centre (even the access to Stockton Heath centre is indirect, via Cobbs Estate).
206. It might be possible to enhance route 47 via Weaste Lane with additional journeys, these perhaps terminating in Lymm, but as noted above, access from the

development site to Weaste Lane is inconvenient. It is almost completely obstructed by the Bridgewater Canal, unless a new footbridge over the canal to Weaste Lane is planned (such a footbridge would be difficult and costly, as the canal is on an embankment already). A pedestrian underpass would be prohibitively costly and probably unpleasant to use.

207. The Grappenhall Heys development is thus singularly difficult to serve by bus, other than by a completely new service from Warrington town centre along Knutsford Road or via Stockton Heath to the A56 Stockport Road, then penetrating the estate in a loop and perhaps continuing to Lymm. Such a service would in principle be a very welcome addition to the bus network, and could possibly be financially viable between 0700-1800 Mondays to Saturdays, but (as set out previously) such services are rarely viable outside these times, and it seems unlikely that long-term subsidy finance would be available.
208. Re-routeing the 5/5A from Thelwall New Road to serve Grappenhall Heys would be very controversial, as it would almost certainly disbenefit a greater number of dwellings than it benefited.
209. Once again, therefore, the prime (and virtually sole) mode of transport from this new development is set to be the private car. This will simply add to existing traffic congestion on Grappenhall Road and through Latchford village centre. Again, the Grappenhall Heys proposal suggests a policy approach that is being made that seizes the opportunity to build on available land (already in public ownership?) and then struggles to work out the transport consequences. A far better approach would be to start with the reality of the existing transport network - including the opportunity for enhancements - and proceed from there.

#### Proposed South East Warrington Employment Area

210. As discussed earlier this proposal seems set to generate very significant additional private car and LGV/HGV traffic. It runs directly counter to a number of Warrington Borough Council and national transport policies. It is a scheme straight out of the 1960s.
211. The Updated Plan states that the South East Warrington Employment Area “will be a major new employment location of 137 hectares, strategically located at the junction of the M6 and M56”. This statement in itself makes it crystal clear that the proposal is entirely road-based, with no possibility and rail or water access, and that it will be sited very remotely from the existing public transport network (both rail and bus).
212. That this massive proposal will generate a large amount of additional car, LGV and HGV traffic is implicitly acknowledged in the Update Plan in para 10.6.3, where it states that “Transport mitigation measures (these are not defined as yet in the Plan) will be identified to offset the impact of traffic generated by the employment development on Junction 20 of the M6. This will be in agreement with Highways England”. Whether this will in the event be sufficient, just in terms of this location in the highway network alone,

remains open to question. Presumably, it will involve additional lanes, traffic signals (at slip roads and non-motorway approaches) or a combination of the two. The location is already notorious for congestion.

213. However, it is inevitable that not all traffic will access the site via the M6, M56 and A50 (from Knutsford). There is no mention in the Updated Plan as to how the remainder of the local highway network - the A50 Knutsford Road to Grappenhall, the Higher Knutsford Road through Grappenhall, the Knutsford Road swing bridge, the Latchford gyratory system, the A56 Chester Road and Grappenhall Road into Stockton Heath centre, the junction of the A56 Grappenhall Road and the A49 at Stockton Heath, the narrow Hunts Lane and Ackers Road and the junction of Ackers Road and the A56, for example - will absorb the extra HGV and LGV traffic generated.
214. The Updated Plan merely mentions in generalised terms that “the principal landowners will be required to prepare a Development Framework.....(which) will need to be agreed with the Council and key stakeholders.....Once agreed, the development framework will enable individual development proposals to come forward.....in a timely manner.” This is stumbling into policy and investment-programme darkness whilst whistling.
215. As previously set out, the two fundamental flaws in the South East Warrington Employment, that:
- The site is solely road-served.
  - The site is remote from where most employees might be expected to live, which would be likely to be across Warrington as a whole, and indeed beyond. Although it would be within cycling distance of the eastern edge of the proposed South East Warrington Urban Extension, it seems very unlikely that cycling and walking would account for a significant modal share.
216. Under Policy MD6.3, Detailed Site-Specific Requirements, s13 lists the transportation and accessibility requirements:
- Improved cycling and walking routes (but see comment earlier).
  - Public transport enhancements to connect the new employment area with new residential areas, Stockton Heath and Warrington Town Centre.
  - Increased capacity (as noted) at Junction 20 of the M6.
  - Other network improvements and travel plan measures as identified by an appropriate Transport Assessment at the planning application stage.
217. The problem with public transport enhancements, as repeatedly pointed out in this response, is that their long term funding is not secure. Bus operators will only operate services without subsidy if they can do so commercially, and providing peak-

only “works bus” type services is inherently expensive even if they load well as there is likely to be little need for them at other times, unless their journeys can be meshed-in with other requirements such as schools journeys. Again as repeatedly pointed out in this Submission, subsidy finance from developers is likely to be limited to a few years at most, and subsidy finance from the local authority scarce, particularly in the light of the current financial climate.

218. Also, in relation to buses meeting the journey-to-work needs of this huge proposed site, new direct bus links to (say) Stockton Heath and Warrington Town Centre will not be enough, as many workers’ journeys will not be on these alignments. Many journeys would involve a change of bus at the Interchange, with attendant delay, thus making direct (fast) travel by car a much more attractive option, especially given shift patterns and early starts.
219. As already pointed out, therefore, the vast majority of workers’ journeys to/from the South East Warrington Urban Extension will be by car, and it would be wholly unrealistic of the Updated Plan to imply otherwise.
220. Section 14 seeks to ensure that “bus routes and bus stops within/close to the site are accessible by pedestrians and cyclists. It is not clear why buses/bus stops would need to be accessible to cyclists, unless it is being suggested that secure cycle parking be provided at bus stops.
221. Section 15 states that “an area-wide travel plan should be created, setting out strategic goals to support the development.” But this would merely be a matter of good intentions. The workforce will make up its own mind as to how it accesses the site. Experience to date at Woolston Grange suggests that bus access will not play any significant role.
222. Regarding freight access, see earlier comments.
223. The statement that removing this large area from the Green Belt “provides a strong Green Belt boundary in this part of Warrington and will ensure that development preserves and enhances the.....natural environment” is strongly questioned. It appears to lack any substance.
224. The Key Evidence and Council Wide Strategies quoted appear to avoid any reference to national transport policy in relation to the siting of freight terminals, without explanation as to why.

#### Lymm (Pool Lane/Warrington Road)

225. The Updated Plan states (para 10.9.2) that land to the west of Lymm will be removed from the Green Belt and allocated for residential development for a minimum of 170 homes.



226. The development is clearly far beyond convenient walking distance to/from Warrington town centre. It would be possible to cycle to Warrington town centre, along the Trans-Pennine Trail or on local roads, but this would require the hazardous passage of the Latchford and the Bridgefoot gyratory systems. Cycling trips would be convenient to Lymm centre, but otherwise cycling is likely to not be significant in terms of modal share.
227. Unlike many other proposals, the location is served by existing bus services, the half-hourly inter-urban route 5/5A. This offers a bus link to Stockton Heath and Warrington town centre, and in an easterly direction to Lymm centre and Altrincham centre, where there is Metrolink interchange.
228. However, the scheduled journey time to Warrington is quite long, at 37 minutes, because the route is indirect (via Stockton Heath) and subject to delay at peak times at certain locations, such as Knutsford Road Grappenhall, Ackers Road/Chester Road signalled junction, Grappenhall Road/Stockton Heath High Street signalled junction and (potentially) the swing bridge there.
229. Buses will thus struggle to be competitive with car journey times into Warrington town centre, which will enjoy much more direct access to the Town Centre via Knutsford swing bridge, and the problem will be greater if the ultimate destination is remote from the town centre, eg the major concentrations of retail outlets on Winwick Road, or the Birchwood Science Park, or the General Hospital, as a change of bus at the Interchange would be necessary.
230. It is thus likely that buses will capture a negligible modal share of trips from the development, and that most commuting, shopping and leisure trips will be by private car. What bus use emerges will at least help the viability of routes 5/5A. It should be noted that these routes have only two evening journeys at present, which will not help.
231. The more moderate total of housing proposed, compared with the very large number of homes proposed for the South East Warrington Urban Extension, means that this proposal would have only a moderate adverse impact in highway-congestion terms. Nevertheless, it is likely that these 170 homes could add 300-plus cars to the roads in the Lymm/Grappenhall area.
232. There would be likely to be additional congestion at locations such as Thelwall New Road/Knutsford Road swing bridge, Latchford, the A50 Stockport Road/Warrington Road (Statham) junction (which may need to become signal-controlled due to limited visibility in both directions for traffic emerging from Warrington Road), the A56 Stockport Road/A50 Knutsford Road signalled junction, and in Lymm.
233. The proposal therefore seems set to add congestion to already-stressed locations such as Thelwall New Road/Knutsford Road swing bridge. The development would avoid these adverse transport impacts if it was located around a rail station, or close to a more frequent bus service. However, the development appears less-acutely

problematical than the South East Warrington Urban Extension, due to its much smaller scale.

234. As with the Grappenhall Heys proposal, the Updated Plan refers to the need for “other necessary network improvements as identified by an appropriate Transport Assessment”. But there are no specific proposals, other than the commitment to ensuring bus stops are accessible to pedestrians. It is unsatisfactory to be expected to support a significant new residential development in the absence of any clear proposals to deal with, for example, public transport requirements. The possibility of “a Transport Assessment” does not offer any firm solutions, and could end up as no more than paper.

#### Lymm (Rushgreen Road)

235. The Updated Plan states that a minimum of 136 new homes (plus a new health facility) are planned for a site in Lymm bounded by Rushgreen Road, Tanyard Farm and the Bridgewater Canal.
236. The adverse transport-congestion impact of this proposal is likely to be very similar to that of the Pool Lane/Warrington Road proposal, though proportionately smaller.
237. There would be an obvious opportunity to link (for pedestrians and cyclists) the development to Lymm village centre via the Bridgewater Canal towpath, which would be as direct or more direct than access along the very narrow Rush Green Road. This is a positive feature of the proposal. The proposed site is also usefully fairly close to the Trans-Pennine Trail, although as previously noted this does not offer an integrated safe cycle route right through to Warrington town centre. The Trail does offer a lengthy link to Stockton Heath. The Updated Plan states that the developer will have to make a contribution to improved cycle links.
238. Eastwards, there are again prospects for safe cycling via the Bridgewater Canal and the Trans-Pennine Trail. However, the narrowness of Rush Green Road makes this a difficult option for safe cycling.
239. As with the Grappenhall Heys proposal (see earlier), this is a site that it is not possible to operate buses through. However, as with the Pool Lane/Warrington Road proposed development, routes 5/5A, with a combined half-hourly frequency, pass along Rushgreen Road. This has the same travel-opportunity advantages and drawbacks as outlined previously. It is likely that buses will capture only a very small percentage modal share of trips from the development.
240. Again, in the Updated Plan there is a general reference to “a package of transport improvements” (unspecified) to support the development, and “other necessary network improvements” (again unspecified) and that there should be good access to bus routes and bus stops (presumably, using footways that are part of the development’s road system). This is all still rather vague.

## Principal Conclusions

241. From reviewing the Plan in detail, these are some principle conclusions:

- the Updated Plan is relatively little-different from previous 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 playing a secondary role
- although there are many very welcome mentions relating to the provision of cycle routes, the value of such routes within and outwith 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 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 small modal share, particularly in winter
- there are repeated mentions of the bus network that, if pressed, crumble. Buses will only run where there is either adequate revenue or compensating subsidy. In South Warrington neither can be guaranteed long-term in any way, and the future prospects for public subsidies for unremunerative evening/Sunday services are particularly bleak. Bus travel is likely to account for only a small modal share
- In contrast, the proposed homes are relatively low-density and are likely to be remote or very remote from workplaces for most residents. The private car is certain to account for the great majority of trips, and in evenings/Sundays for virtually all trips.
- The incentive to use the private car will be emphasised by the difficulty of reaching most destinations (other than Stockton Heath village centre and the recently steeply-declining town centre). 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.
- 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 ameliorations for these. The

proposed Western Link, the Council's premier highway scheme, is near-irrelevant to local travel needs in Stockton Heath, Grappenhall and Latchford.

- 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
- 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
- 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.

David Thrower  
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