

TRAMS FOR WARRINGTON
RESPONSE TO THE UPDATED PROPOSED SUBMISSION VERSION (PSV2)
LOCAL PLAN - SEPTEMBER 2021

1. INTRODUCTION

It is this Group's assertion that this revised version of the Local Plan lacks a clear vision for the future of Warrington and essentially PSV2, if it is adopted in its current form, will continue to ensure that Warrington will continue to be a 'car-centric' town. This will severely limit the full economic potential that Warrington undoubtedly has and will condemn it to a future that repeats the unintended mistakes of past local planning policy.

Trams for Warrington was an 'expert' stakeholder in the AECOM consultation and there has been no feed back to date. PSV2 has not taken into account significant local expertise and knowledge.

In order to achieve a zero carbon and healthy environment for Warrington people, a bold ecologically sustainable transport (BEST) plan is needed. Warrington can benefit from the experience of other similar sized towns, and should have the ambition of becoming Britain's Greenest place ?

From our research one of the few certain ways to reduce car (commuting) traffic is by having an integrated tramway. Evidence shows this will attract about a quarter of car trips, reducing traffic and congestion. Less car traffic means less air pollution. There is no evidence that car users will switch to bus, as the Runcorn Busway has failed to achieve since 1980.

This Group has prepared a draft tramway plan, which using renewable power will be zero carbon, and could be self funded.

We would propose that this tramway plan becomes the core of the new Local Plan, in place of the draft for public consultation, which without doubt given the Government's new sustainable policies "Trees, Trams and Trikes", could be rejected at a public inquiry. Let's get on the right track now ?

2. SUSTAINABILITY

The National Planning Policy Framework 2021 states that plans should achieve sustainable development in a way that is aspirational and also deliverable. We do not think PSV2 fulfils this brief and, as a consequence, is not sound. NPPF, page 30, Section 9, para 104 Promoting Sustainable Transport states that:

'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated'. We assert that the main focus of WBC has been to provide a Local Plan first rather than ensuring that a robust review of Local Transport Plan 4 (LTP4) running simultaneously and alongside PSV2 has taken place.

NPPF p.30, also states that:

'Significant developments should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help reduce congestion and emissions, and improve air quality and public health.'

In order to be sustainable developments should 'meet the needs of the present without compromising the ability of future generations to meet their own needs.' PSV2 does not fulfil this expectation. Instead, it compounds the current problems of the town by placing housing developments either where the current infrastructure is strained or where there is no current infrastructure in terms of transport and health and wellbeing facilities. Current planning legislation does enable money (S106) to be in place to provide upfront funding for infrastructure.

3. DEVELOPMENTS IN SOUTH WARRINGTON

The focus of PSV2 is still on building satellite housing developments (Garden Suburbs) where opportunities to improve the transport infrastructure are extremely limited thus making these developments unsustainable. For instance the South East Warrington Urban Extension (SEWUE) follows the old model of putting housing in areas where the transport infrastructure is already inadequate, at capacity and will not be able to absorb increased numbers of cars and HGVs. Public transport is almost non-existent and services are being cut. Warrington's Own Buses are investing in a new electric fleet but there is little confidence that bus services will increase significantly and be cheap enough to enable a high take up by the public in this area thereby making it sustainable. Most of the proposed new developments in South Warrington follow this model and, by definition, are not sustainable.

There are multiple proposals for the local road network in Stretton. It has yet to be proved that the upgrade of the A49 roundabout at Longwood Road would bring any significant improvement, nor would the upgrade of the traffic lights at Lyons Lane. The Cat and Lion relief strategic road link connecting near the Spire Hospital on the A49 would increase congestion and backing up to the slip roads on M56 J10.. Instead, any distributor road should connect directly to M56, at J10 thus reducing any impact on the local network. The 'stopping up' of the B535 at the Cat and Lion junction with Stretton Road will severely impact on local residents and will increase local journey times, distances and air pollution. This would appear to be in contravention to NPPF guidelines.

As part of an integrated modal transport system, the Group asserts that the provision of a 'park and ride' facility would greatly reduce the levels of cars on Warrington's road network and this would provide an opportunity for an integrated transport system to include trams and buses. There are further opportunities to introduce park and ride schemes within the town i.e. Morrisons Car Park, Stretton and B & Q Winwick.

Stockton Lane is another example of a poorly considered and incomplete strategy. The location of this development is inappropriate as the current road system is inadequate. It is a single carriageway, next to the canal. It has been closed off for many years as a result of a fatality when a car came off the road into the canal. PSV2 suggests that traffic from this

development would enter the main highways at the Lumb Brook viaduct and the junction with Knutsford Road. Traffic would back up on the local roads as well as the Knutsford Road. The junction at the other end leads to a hump backed bridge at Grappenhall and this again would seriously impact the traffic lights on the Knutsford Road.

4. PINCH POINTS

PSV2 provides no credible strategy showing how existing pinch points in South Warrington, Stockton Heath High Street, Stockton Heath Swing Bridge, the Lumb Brook Underpass Bridge, the Cat & Lion junction in Stretton and the Latchford/Kingsway gyratory, will be relieved. The inevitable increase in domestic and commercial traffic that out of town developments will bring to the existing infrastructure will mean that traffic will be brought to a halt more frequently than is currently experienced. This, in turn, will bring with it increased levels of pollution. It should be noted that Peel Ports has aspirations to significantly increase journeys on the Manchester Ship Canal which will compound current problems as the swing bridges will be closed more frequently. In addition, these Victorian infrastructures are controlled by a third party (Peel Ports) over which WBC has no control.

Similar infrastructure problems exist with the Thelwall Heyes development which will decant traffic directly on to Cliff Lane. This particular proposed development will only have one entry in and out. It will create a bottleneck from Cliff Lane and add further pressure to the A50, Knutsford Road. Add to this, the significant increased car traffic (2,400 on site car parking spaces) and HGVs which will come from the 6/56 Langtree proposed development and the potential Stobart development, it is clear that the local network will be unable to cope and air pollution will inevitably increase. This is clearly not within NPPF guidelines.

5. OPPORTUNITIES PROVIDED BY FIDDLERS FERRY

PSV2 continues to perpetuate the rationale of past New Town planning and, therefore, does not align with NPPF policies stating that plans should 'be prepared positively, in a way that is aspirational but deliverable.

Although we welcome PSV2's development of brown field sites such as Fiddler's Ferry and town centre development as a means of reducing the pressure on Green Belt, we assert that it does not go far enough and is not visionary enough. Fiddlers Ferry already has two rail links which can be developed further into a more cohesive rail strategy, linking Liverpool, Manchester, Warrington and further afield via HS2. It is capable of providing housing and employment which will be sustainable with good transport links and offers the possibility of new rail stations opening up.

Fiddler's Ferry could open up an area for development which would enable a greater concentration of housing to the west and northwest, between Fiddlers Ferry and the Liverpool-Warrington-Manchester railway where it intersects with Farnworth Road. A new station would give easy access to Warrington, Liverpool and Manchester. This would be a driver for economic growth.

6. WESTERN LINK

In PSV 1, the South Western Urban Extension was said to be the 'trigger' for the Western Link and the road would not be built until building of the 1,600 houses in Walton had been substantially progressed. Now that this has been removed from PSV2, the business case is more severely compromised despite partial government funding. Major concerns have been expressed that such a highly complex and technical scheme for a single carriageway road, at a budget of £212m is unrealistic and will mean that the scheme will be undeliverable. This road will have issues regarding the high level bridge crossing of the Manchester Ship Canal (potential gradient issues); it will cross under the Network Rail London to Glasgow line (Victorian Walled viaduct; it will cross under the Network Rail West Coast mainline viaduct. In addition, the controlled junction on the A56 will change the character of a semi-rural area beyond recognition. A single carriageway road connecting two existing dual carriageways would not seem to have the capacity to cope with a potential influx of cars and HGVs rat running from J11 on M56 to Sankey Way A57 and inevitably on to the M62 as well as traffic avoiding the Mersey Gateway tolls.

7.GREEN BELT

NPPF paragraph 140 states that :

'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.'

This Group challenges the requirement of PSV2 that 816 houses are built every year and suggests that a more realistic and deliverable target is set at a lower build rate of 600 per year. Over the past ten years the average build rate in Warrington has been 567 and the Borough Council's own Housing Strategy '2018-2028' (written in 2018) called for 586 per year. 816 as a target has been imposed by government and is not achievable. By following this requirement, whole swathes of Green Belt are likely to disappear forever.

This Group asks that Warrington Borough Council challenges the government on these high numbers before enshrining them in the Local Plan.

8.AIR QUALITY

The Green Belt is the lungs of Warrington and without a clearly defined Green Belt air quality is likely to be compromised.

PSV2 encourages satellite housing developments and air quality issues are likely to increase rather than decrease. PSV2 does not appear to recognise the landmark decision in December 2020 when the death of Ella Kissi-Debra, a nine year old child, from acute respiratory failure was directly attributed to exposure to air pollution. WBC does not have robust air quality monitors throughout the town to ensure that air quality in Warrington remains within WHO standards. It is not only NO2 that must be monitored but also PM2.5 and PM10 as these particulates are the most dangerous to our residents.

NPPF para 105 supports this approach:

' The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be

made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.'

In March 2021, Client Earth published the following:

'After years of warnings from the European Commission, the Court of Justice of the European Union (CJEU) ruled today that the UK has “systematically and persistently” exceeded legal limits for dangerous nitrogen dioxide (NO₂) since 2010, and has failed against its legal duties to put plans in place to tackle the problem in the shortest possible time. This could see the UK facing fines if it still fails to take action to comply ... “The government has been dragging its feet for too long on the air pollution crisis, downplaying the problem and passing the buck to local authorities.'

Source:

<https://www.clientearth.org/latest/press-office/press/top-court-confirms-uk-has-broken-air-pollution-law/>

The seriousness of this is so great that Warrington Borough Council MUST press the government to take responsibility and stop 'passing the buck' to local authorities.

9. TOWN CENTRE MASTERPLAN/FIRST AND LAST MILE

In January 2021, the Warrington Town Centre Master Plan Executive Summary was published. However, once again this report is limited in its aspirations for the town centre as it focuses on the town centre footprint as it currently is. A re-invention of the town centre could be achieved by removing some of the retail parks/car parks (as well as some other retail outlets) out of the town centre and re-locating them on the outskirts. This would increase the available brown field footprint and would enable it to be developed in a comprehensive First and Last Mile strategy which the Master Plan purports to support: 'The FLMTM supports the aspirations of the Warrington Local Transport Plan (LTP4) as they apply to the Town Centre by setting out a strategy to guide changes to the highway network in the town centre, to create an inclusive and accessible place for all, and supporting Warrington's growth and connectivity ambitions through quality place -making and sustainable travel options.'

The First and Last Mile would help reduce car dependence/ownership through a fully integrated multi-modal transport system (bus, light rail, rail, cycling and walking). It would become a place people wanted to live in. However, the aspirations of the Master Plan as they currently stand are not ambitious enough to encourage even more mixed housing in the town centre and lower car dependency. By increasing the scope/vision of this First and Last Mile Master Plan Warrington would become a vibrant, cultural town which could then claim 'city' status with confidence. This would provide a greater mix of employment opportunities, enabling the town centre to regenerate and be sustainable.

10. CITY STATUS

Warrington has aspirations to become a city and what better way to demonstrate a commitment to city status and all that it brings with it than to become a beacon of innovative transformation for both transport and town planning. We would assert that this can only be

done by changing the priorities of PSV2 and to put transport first and foremost, thus enabling deliverable housing to be in the right places and served by efficient, integrated transport systems. This would also address the town's growth aspirations and make it a desirable place to both live and work. As it currently stands PSV2 is constrained by outdated thinking linked to the old New Town planning policies of the 1960s and this stifles the vision of what Warrington could be.

11.CLIMATE AND ECOLOGICAL EMERGENCY

Cop 26 has just taken place in Glasgow and it is essential climate change and ecological biodiversity should be an integral part of any Local Plan and Local Transport policy in a post Covid world.

NPPF 2021 Section 14 - Meeting the challenge of climate change, flooding and coastal change Para 152 states that:

' The planning system should support the transition to a low carbon future in a changing climate, ...It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'

It should be noted, in this context, that much of Warrington's current housing stock is prone to flooding and whilst certain flooding defences (e.g.Latchford) have been put in place there is a great need to ensure that all future housing is protected by robust and future-proofed flood defences.

There is little evidence in PSV2 and LTP4 that biodiversity and climate change have been at the forefront of Warrington Borough Council's thinking and forward planning. Trams for Warrington asserts that up to date methodology has not been the basis for PSV2 and it is, therefore, not fit for purpose in today's climate changing world.

12.SUMMARY

PSV2 continues to perpetuate the rationale of past New Town planning and, therefore, does not align with NPPF policies which state that plans should be prepared 'positively, in a way that is aspirational but deliverable.

Trams for Warrington does not consider that this plan is sound, justified, effective or deliverable for the following reasons:

- Projected housing numbers are not deliverable and Warrington Borough Council must challenge the methodology to give a more realistic and achievable build;
- Warrington needs an integrated multi-modal transport system together with other strategies to ensure that it moves from a car dependent town to a town where an individual's carbon footprint can be reduced and to a town that is free from the harmful effects of air pollution;

- There must be a complete strategic transport review which will enable housing developments on brown field sites before even considering green belt land;
- New housing MUST be easily accessible so residents have the choice of not using polluting vehicles for local journeys in Warrington;
- There is very little future proofing for the changing needs of Warrington, especially in the Central area;
- A truly integrated transport system MUST be at the forefront of any plan to reduce Warrington's car dependency.
- Warrington Borough Council has
- There is considerable uncertainty at government level that the current planning legislation is fit for purpose and it is possible that by the time PSV2 has gone through the consultation/examination process current legislation will have gone through considerable change. In the light of this uncertainty, Trams for Warrington asks that Warrington Borough Council pauses PSV2 until there is absolute clarity on legislation.

Finally, our representation is seeking a change to the Plan and, therefore, we formally request the opportunity to be invited to be heard at the hearing sessions of the Examination in Public.

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