RSWF Response to WBC Local Plan Consultation: Report 1 – Transport concerns and the potential impact on South Warrington

1. Introduction

Following the publication of PSVLP21 the RSWF Group felt it essential to undertake a critical view of the document in terms of transportation proposals for South Warrington.

2. Brief

The RSWF Sub Group undertakes a critical review of the PSVLP21 in relationship to transport proposals and the potential impact on South Warrington.

3. General Observations

Warrington's Transport challenges derive fundamentally from densely packed roads caused by constraints arising from:

- 3 waterways: The River Mersey, The Manchester Ship Canal (MSC) and The Bridgewater Canal passing through or near to Stockton Heath and Warrington Town Centre.
- Nearby motorways: The M6 (N-S), M56 (E-W) and M62 (E-W)
- Existing railway networks.

Traffic congestion and resulting air pollution is a major concern and affects the whole town so the maintenance and preservation of adequate green space is essential/vital in providing an air quality counterbalance. Data taken from the World Health Organisation (WHO) ambient air quality database published on the 29th May 2018 names Warrington as one of the top 5 towns/cities in England that exceeds the pollutant limit. This is a damning report on the Council and exposes the lack of care and safeguarding being afforded to Warrington residents. Therefore the proposed additional Circa 5,000 dwellings (800 on site, 2,400 and 1,800 proposed) in South Warrington will have a deleterious effect upon air quality and noise, particularly in congested locations such as Stockton Heath High Street and Latchford Village. The RSWF Group have also produced and submitted previously (PSVLP19) to WBC a separate report that focuses on air quality and the negative impact these plans will have on Warrington residents.

Senior Council Officers have stated during the current Local Plan consultation period that the PSVLP21 is in parallel with the Council's adopted Local Transport Plan 4 (LTP4), however the LPT4 and Executive Summary define a high level approach to addressing the challenges of the many transport problems in and around Warrington. The document title states that it is a PLAN but does not contain sufficient realistic detail to give credibility to a plan. It appears to be futuristic and aspirational in its view in resolving the major and minor issues faced by the Town. Most of the transport

initiatives are medium to long term investigations and not beneficial implementable plans and do not benefit or complement the PSVLP21 in a timely manner.

The schemes, or possible schemes, listed in the PSVLP21 document will, in total, cost a very significant sum. Given pressures on overall UK public expenditure, and specific pressures on the Department for Transport, particularly from major metropolitan areas close to Warrington, there is little prospect that no more than a very small fraction of Government funding could realistically be achieved in the timescale of the Local Plan (2021-2038). Almost all of the LTP4 is an aspirational wish-list and (partly due to the uncertainty of funding) no firm timescales are offered regarding delivery. Indeed most schemes/ideas are still marked down as for future consideration over the next 5 years with no apparent detailed design work carried out to date and absolutely no commitment to programming.

The PSVLP21 provides little evidence to support their assertions of effective cross boundary working and in particular the lack of dialogue with Merseyrail or Metrolink of the City Regions about integration of transport networks.

Discussions with Council traffic planners at the recent Council's Local Plan consultation event have confirmed LTP4 as a 'concept' aspirational document which only outlines some options and some preferences. Therefore it lacks important detail for residents to make real judgements on the benefits of the PSVLP21 in relation to traffic infrastructure.

Some of the LTP4 is dependent on securing significant changes in public behaviour, including walking cycling and bus patronage. No evidence is offered other than optimistic hope that these changes of mode, away from car usage, will in fact occur. It is ironic that the Council have presented the opposite showing trend patterns over the past decade showing a dramatic fall in bus usage.

The PSVLP21 (LTP4) provides no credible strategy on how the Council intends to deal with and resolve existing highway congested pinch points over the MSC. These include Stockton Heath High Street, Stockton Heath Swing Bridge, Knutsford Road Swing Bridge, and the Latchford/Kingsway gyratory. Furthermore, no measures have been included to resolve traffic congestion across the single lane crossings of the Bridgewater canal whose roadways were designed and built for the 19th century and now not suitable to service 21st century traffic.

The Council's traffic model is unrealistic, it assumes that the three swing bridges are continually in place and do not open. It also seems to assume that there are no disruptive road works anywhere in the Borough.

The PSVLP21 housing strategy places a major emphasis upon creating the South East Warrington Urban Extension (SEWUE) residential settlements in South Warrington and South of the three waterways. In complete contrast the LPT4 openly admits that the preponderance of workplaces such as Lingley Mere, Omega, Town Centre, Railway Stations, Gemini/Winwick Road Retail Park, Woolston Grange and Birchwood Science

Park are north of the three waterways. This mismatch is wholly illogical and is a recipe for growing and increasing intractable highway congestion.

Much of the travel needs of the SEWUE low density development estates will inevitably be met by private car as almost all of the SEWUE will be beyond typical convenient walking distance from the nearest main centre (Stockton Heath). The emphasis placed by the Council on cycling fails to recognise the topography of South Warrington in particular the hilliness of Grappenhall Heys/Appleton in relation to Stockton Heath/Latchford. Cycling will therefore likely only account for a small modal share and even less during winter months. In practice the main mode of travel will undoubtedly be car.

The aspiration of LTP4 that the Council envisages increasing local public transport use by three times during the local plan period is at odds with the facts i.e. 50% fall in bus usage in the past decade (excludes the pandemic over the past 18 months) partly due to:

- High car ownership
- Town Centre retail decline
- Unreliable bus services
- Traffic congestion and lack of certainty and reliability
- Withdrawals of services
- Relatively high fares

Even one of the above factors would prove very challenging to reverse the trend let alone all six in combination. In addition the LTP4 does not expand on where the funding will come from to provide the necessary increase in buses required and the consequential effect on the Town Centre bus terminal etc. The laudable aspiration to treble bus usage may therefore be largely or even wholly unrealistic and unattainable.

There will be virtually no means to inhibit private car use. The increase in road traffic (cars) will not only create additional congestion and delays and will further undermine the fragility of an already unreliable bus service.

4. Priority Transport Infrastructure Initiatives.

PSVLP21 identifies two initial major priority road schemes.

(a) The Western Link.

From examination of the Council's Western link website it can be derived that the proposed new link road facing tremendous technical challenges in the delivery of this ambitious project i.e.

- Controlled junction on the A56.
- High level bridge crossing of the Manchester Ship Canal. (Potential gradient issues).

- Under crossing of the Network rail London to Glasgow line (Victorian walled viaduct).
- Under crossing of the Network rail West Coast main line viaduct.
- New River Mersey Bridge crossing.
- West/East Ditton goods/Arpley rail viaduct.
- St Helens canal bridge crossing.
- Sankey Brook bridge crossing.
- Cromwell/Sankey Way junction.
- Construction of new single carriageway road from A56 to A57.

Although now granted conditional partial Government funding approval (the final business case still needs to be submitted to the Government) there are real concerns that the budgeted £212m will not be sufficient to deliver such a complex and high risk civil engineering project, which undoubtedly, due to the nature of the works, will encounter unforeseen and likely extra cost delays. In addition to the physical challenges, over the past 2 years there have been significant increases in both labour and material costs that will undoubtedly impact on the Council's original budget. The high potential for underfunding gives doubt as to the schemes financial viability and presents a real risk to the Local Authority. Furthermore the planned start on site is already two years behind schedule!!! Revised commencement date of 2023 with an anticipated completion/open to the public 2026. It is therefore essential that confirmations of the total scheme costs are reaffirmed to ensure that the scheme is deliverable within its Outlined Business Case (OBC).

The UPSVLP highlights this scheme as a major priority infrastructure initiative and no proposed enlargement of housing should be committed to until this scheme is delivered to avoid further traffic congestion and air pollution. A question to the Council is: What are their plans if the scheme is not delivered?

Further observations:

- The first major comment is that the link will beneficially remove a large amount of traffic going through the centre of Warrington. However although this proposal will relieve the A56 Chester Road swing bridge, and Chester Road/Bridge Foot, the Western Link will be wholly irrelevant to traffic heading to/from the Town Centre and the North Warrington 'M62 employment belt' from the A49 corridor (to the South) and from the A50 corridor (to the South-east), and from the existing and proposed new settlements in between. In simple terms this project offers limited benefits to the majority of South Warrington residents and businesses. This of course is based on the premise that this new Western Link will remain toll free, otherwise traffic will continue to use Chester Road and Bridge Foot.
- There must now be doubts as to the need for the Western Link now that Port Warrington expansion and the business hub have been removed from the Local Plan. The residential allocation of 1,600 homes on the South West

Urban extension has also been removed from the Local Plan further giving rise to the business case to support the schemes viability.

- The design of the Western Link is a single carriageway road connecting two existing dual carriageways which would seem to be illogical and badly thought through from a future prospective, bearing in mind the aspirational and unjustified employment development objectives proposed by the Council. It is interesting to note that when Council officers were challenged at the Council's consultation event on the single carriageway design their response was that of economic and financial constraints as the determining factors. Therefore the proposal shows a gross inconsistency with other strategic infrastructure routes. To simply state that the Council has gone ahead with a scheme that ultimately may fall short due to its design on the basis of financial constraints is both unacceptable from the public purse prospective and unsound transport planning.
- The overall benefit of the Western Link to the existing highway infrastructure is highly questionable London Road (A49) and Chester Road (A56) as the vast majority of residents in South Warrington travelling north are extremely unlikely to use the Western Link to access services or employment within the Town Centre. Indeed with the proposed residential growth the current level of traffic congestion will become intolerable.
- The Western Link is near irrelevant to local travel needs in Stockton Heath, Grappenhall and Latchford.
- The potential for HGV'S,LGV's and private cars rat-running through the villages of Stretton, Hatton and Daresbury are a real threat and cause for considerable concern to local residents.
- * The Western link will most likely become a rat running for HGV's between Junction 11 M56 and the M62 to avoid both the M6 and Mersey gateway Toll bridge.

(b) SEWUE enabling infrastructure.

- Existing junction upgrades to A49 Lyons Lane and A49/Longwood Road junctions.
- A new link between the B5356 Stretton Road and the A49 London Road south of the existing connection, including a new signal junction on the A49 and the stopping up of Stretton Road at its existing junction with the A49.
- A new link between Witherwin Avenue and Dipping Brook Avenue The "D".

• A new link between the "D" and Grappenhall Lane with junction improvements at Barleycastle Lane.

There is very little detailed explanation as to what these proposed enabling works consist of and how the existing highway infrastructure will be changed to suit.

This enabling infrastructure is generally flawed, unworkable and presents an increased potential for traffic congestion on the A49 from the Cat and Lion signal junction to Junction 10 of the M56. It also severely restricts local traffic accessing the immediate Stretton village facilities. Furthermore, it introduces health and safety issues for local residents.

The reasons are explained below; however the issue of traffic light timing at the Cat and Lion junction shall be excluded from these comments as they have supposedly already been previously optimised by WBC highways department.

- I. It is unclear as to why the A49 roundabout junction at Longwood Road needs upgrading at an indicative cost of £1.06m (Infrastructure Development Programme 2021 (IDP21)) (developer financed). This roundabout functions well and does not present any traffic congestion.
- II. It is unclear as to why the traffic signal junction at Lyons Lane needs upgrading at an indicative cost of £2.83m (IDP21) (developer financed). This signal junction functions well and does not present any traffic congestion.
- III. The proposed A49 signal junction for the proposed strategic infrastructure distributor link road (Cat and Lion relief road) possibly located at Fir Tree Close/Spire Hospital entrance will most probably introduce further delays and congestion to increased traffic flows. This new signal junction will be approximately 300m from the Cat and Lion signal junction and as close coupled signals will undoubtedly provide timing issues, as exemplified in Stockton Heath village, it will result in additional congestion and backing up to M56 J10 slipways.

The Council are already in possession of an alternative solution that avoids adding further signal junction on the A49. This would require the Council to engage proactively with Highways England and upgrade the M56 Junction 10 (interestingly this was the envisaged connection in 1972 for the proposed South/North new expressway detailed in the New Town Outline Plan!!) to incorporate the proposed strategic infrastructure distributor link road and achieve the following outcomes:

- Minimum or no disruption to the A49
- Provide the necessary bypass solution to the current Cat and Lion junction congestion.
- Revert the need to stop up Stretton Road.
- Afford better access to the front and rear of the Stretton Fox Pub.

The IDP21 already includes a sum of £5m for undertaking some upgrade to the M56 J10 and savings against items I, ii, and iii could be realised and used to support a better and more practical solution.

- iV. The 'stopping-up' of the B5356 (Stretton Road at the Cat and Lion Junction) will cause serious disruption to local residents as follows:
 - (a) It will prohibit local village traffic easily accessing the school and extend journey time / distance.
 - (b) It will prohibit local village traffic accessing the Church and extend journey time/ distance.
 - (c) It will prohibit traffic accessing the Park Royal Hotel and extend journey time/ distance.
 - (d) It will prohibit local residents accessing their residencies and extend journey time/ distances.
 - (e) Traffic wishing to cross the A49 from Stretton Road into Hatton Lane will be prohibited and will extend journey time/ distance.
 - (f) It will result in an increased reaction time for emergency services. This has potential Health and Safety repercussions for local residents.

The proposal will result in even more traffic using the A49 travelling south between the Cat and Lion Junction and the proposed new signal junction for the strategic infrastructure distributor link road.

It must be noted that this proposal is in contravention to the adopted LTP4 by increasing journey distance, increased air pollution, increased noise and totally to the detriment of the local community.

This has very serious implications for Stretton Village and the rest of the proposed SEWUE as it opens up direct HGV access rat running between the M56 Junction 10 and the proposed 6/56 development and the whole of the Barleycastle Trading Estate. It would be remiss of the Council not to assume this and unless strict weight restrictions are applied the proposals will result in the route becoming a heavily used freight road that will have an environmental impact on the area in terms of air pollution and noise.

It is interesting to note that the 6/56 development with its lack of rail access, demonstrates that the Council's policy for developing multimodal freight transport facilities in order to assist in the sustainable movement of goods is flawed and patently not being practised. If it was then a rail served site would have been put forward.

The 6/56 Development which is planned to be located within the proposed South Warrington Urban Employment Area and will create significant increased traffic (HGV's, LGV's, and cars). In their initial Planning Application Langtree have indicated that the new development will generate over 4,000 jobs and that they intend to provide 2,400 on site car parking spaces. This level of increased traffic will have an immense detrimental effect/impact on the already overloaded local highway network.

There is also no clear strategy that ensures traffic generated by the SEWUE will not have an adverse impact on the local community. The effects on the current highway infrastructure will be enormous i.e. A49, A56, A50, in particular Stockton Heath High Street, Stretton Village, Grappenhall Road, London Road, Lumb Brook Bridge, Wilderspool Causeway and Latchford Village.

The PSVLP21 lacks detail on how traffic will be managed within the proposed Stockton Lane residential area. No substantive funding has been included within the IDP to address traffic movement towards Stockton Heath/Warrington Town Centre.

There is no evidence to support the assumption by the Council that the proposed three new strategic link roads will reduce traffic travelling from Stockton Heath via the A49 to the M56. It is illogical to think traffic would divert from the A49 onto the SEWUE strategic highway and then be confronted with the new A49 signalled junction beyond the Cat and Lion Junction and before Junction 10 of the M56.

The Council have alluded to within their background documentation that the SEWUE will incorporate an enhanced vehicular movement network. The objective will be to use this network to improve linkages to the Town Centre, particularly through enhanced public transport networks. The primary loop being a transport corridor linking Warrington Town Centre via the A49 and A50. However much of the SEWUE will not be directly serviced by such a bus route, unless if performs a protracted service of zig-zags. Then in trying to reach the Town Centre it will have to contend with London Road and Stockton Heath High Street traffic congestion (no possibility of a bus lane unless substantial demolition is undertaken) or the A50 Knutsford Road and Latchford Village traffic congestion (ditto ref demolition).

There also appears to be no appreciation of the consequential traffic flows in regards to the proposed SEWUE local centres/community hub and the anticipated increased traffic movements on both the A49 and A50.

The PSVLP21 takes little or no consequence of the fact that the existing South Warrington highway infrastructure is already at saturation point at peak periods and massive investment is needed to improve the existing roads and bridge crossings of all three waterways (Bridgewater, MSC and River Mersey). The PSVLP21 does not provide the necessary deliverability across the Plan period i.e. the Mass Transit is acknowledge as being after 2038 but assumes the construction of new Housing developments beforehand.

The Impact of the significant increase in road traffic that will accompany the very large scale of both the SEWUE and the South East Warrington Industrial Area developments would inevitably take the form of;

- *Delays in traffic movements due to increased gueues.
- *Increased journey times due to unpredictable stress on the highway network ie road accidents, roadworks, displaced Motorway flows, breakdowns etc.
- *Disruption to travel on emergency services and key workers.
- *Unpredictable delays to Bus services and knock on effect on patronage.
- *Increased Air and Noise pollution.
- *Increased difficulty in crossing roadways for schoolchildren, people with disabilities and the less agile.
- *An overall sense of reduced quality of life.

The proposed Strategic Highway Network is ill conceived and the SEWUE Plan is doomed to failure and will result in unacceptable hardship to local residents.

5. Active Travel Policies

The Councils Active Travel Policies appear to be a laudable set of policies to ensure the vision of a healthier Warrington resident facilitated through walking and cycling. Evidence has been presented to support this shift towards this healthier view for the younger population. However this unrealistic and naïve and it is more likely that the whole population will not adopt this rather rose tinted view.

In addition what cognisance has been paid to the topography of South Warrington i.e. it is very hilly and the gradients on existing routes do not lend themselves to commuter cyclists.

The active travel policies do not address the obstructions presented by the three main waterways which isolate the Southern area of Warrington to the Town Centre. There would appear to be no transport infrastructure identified within the Council's IDP21 to facilitate ease of walking or cycling into the centre of Warrington other than the existing network.

The LTP4 also states that 'there will be a local cycling and walking Infrastructure Plan' and 'The enhanced Green Space and Waterways network... will provide high quality walking and cycling routes'. However such cycling and walking networks need to be both comprehensive and continuous as there is only limited value in providing isolated lengths of walkway/cycleway that end at complex multi-lane junctions or large roundabouts. Indeed the LTP4 admits that the present Town Centre is 'impenetrable'

for cyclists. These comprehensive networks also need to be in place in advance of demand, not slowly developed piecemeal. The total cost will be significant and will involve giving priority to 'Green' transport modes at key junctions, the very reverse of Warrington's present situation. There will consequentially be an adverse effect upon motorised general highway traffic, which has not been factored into the Council's transport modelling, as clearly schemes have not yet been designed. Therefore there seems extremely little likelihood of comprehensive walking and cycling networks being planned, funded and constructed as to be fully in place by the time the proposed settlements are constructed in South Warrington.

6. Smarter Travel Choices Policies

The Councils Smarter Travel Policies (STP's) are once again laudable policies but they are largely supportive of the Active Travel Policies. All of the STP's rely on a social shift, which is a very optimistic view especially for the older generation.

Social change has to be targeted at the full age range of the population. The STP's do not address the older generation and their needs. ST7, regarding bus travel and improvements specifically needs to address this. However, these policies are minor with respect to the bigger picture of the problems facing Warrington's congestion and air pollution problems. The vast majority of the STP's are to continue or support existing initiatives and to investigate a very small number of newly defined and sufficiently detailed that really give people any valid options bike sharing (ST3) from the South of the Borough will not happen due to the difficulty of getting over the waterways safely.

The Town Centre car club is also an aspirational pipedream with no substance.

7. Passenger Transport Policies

The Councils Passenger Transport Policies (PTP's) are targeted at two main areas, bus and rail initiatives. Both are vital to the smooth running of an effective transport system throughout Warrington and with the wider country. These policies seem to have a sensible outlook. However, once again, given the waterway barriers separating North and South Warrington there are no plans to address or improve local connectivity to effectively support PTP's or solutions there are no rail links in South Warrington so that is a none starter. There are no proposed improvements defined in the Council's IDP to invest in improving the many small crossings of the Bridgewater Canal, nor the MSC or River Mersey. The only major construction planned to connect north to south is the Western Link which in no way serves the PTP's

The introduction of Mass Transit System such as a Light Rapid Transit (Tramway) guided bus system can be attractive in reducing car usage and air pollution, however before such a system could be considered as a potential solution to Warrington's future public transport needs it would need to undertake a rigorous examination.

This would require carrying out a major feasibility exercise to look at issues such as detailed route and station planning, connectivity, integration with existing public transport operations and facilities, land availability, legal processes, passenger demand forecasting, funding sources, full cost benefit analysis, park and ride opportunities and the potential impact on existing property owners. A fundamental issue to be considered is the impact of the introduction of such a system on the existing road network and waterway crossings in terms of construction and future operation.

The LTP4 states both that 'we (WBC) will identify options and that the concept of developing a Mass Transit system....is at a very early stage', both of which suggest no detailed thinking has yet occurred.

However contained within the SEWUE supporting evidence based document the Council have indicated a Mass Transit Safeguarded Corridor (MTSC) which commences opposite Barleycastle Industrial Estate and meanders illogically through the northern end of the SEWUE and terminates at Stockton Lane. The only rationale for this route is the Council's aspiration to continue the MTSC towards the proposed replacement High Level Cantilever Bridge (identified within the IDP21). If this route is indeed the Council's intention then a significant number of properties will be affected by this plan and lead to blighting of residents homes.

The Council needs to confirm that sufficient detailed work has been undertaken to justify their action and there is a real need for transparency regarding this matter.

8. Network Management Issues.

The Council's Network Management Policies are a necessary requirement to keep the network in a viable and workable condition, with new measures targeted to be introduced to improve network operation. However NM11 is the Achilles heel in the whole roadway system serving South Warrington. Peel Ports has ownership of all the swing bridges and the Cantilever Bridge within the Warrington network system. Peel Ports also has full control over the operation and maintenance of these bridges. Although WBC continues to work with Peel to maintain traffic flow, Peel has the right to operate the swing bridges at any time to facilitate vessel movements.

The three swing bridges were designed and constructed over 125 years ago when the MSC was opened in 1894. The bridges originally served a far lighter load than those being imposed today. It must be assumed that they are well past their design and operational life span and it is doubtful, due to wear and tear, whether they will contend with the proposed increase in vessel and traffic movements. It must also be noted that the LTP4 or IDP21 makes reference to replacing or undertaking a major review of the 19th century swing bridges therefore how viable is a Transport Plan that fails to address the Council's reliance on a Victorian infrastructure that is controlled entirely by a third party.

The failure of one or more of the bridges has the potential to gridlock traffic to and from South Warrington. Even the Western Link, if it eventually gets built, will not solve this problem.

Furthermore, the possibility of the conceptual High Level Cantilever Bridge replacement is only planned for the medium term which will present major planning problems. In addition the PSVLP21 indicates safeguarding land adjacent to the existing weight restricted Cantilever High Level Bridge. An unanswered serious question is what will the replacement bridge carry i.e. HGV's or light traffic? Also there has been no regard given to necessary highway infrastructure (whether it is for HGV or light traffic). This is a major omission and is raising public concern particularly in relation to the illustrated MTSC.

9. Freight Management

The greatest cause for concern within LTP4 is the future increase in LGV and HGV traffic movements within the Warrington Network which will add thousands of additional vehicle movements daily to the M6, M56 and M62. This coupled with the proposed Six/56 Logistics Development and Stobart's potential development; both will flood South Warrington with LGV and HGV's. This will have a severe impact on the local roadway infrastructure and it will introduce increased levels of vehicle emission pollution and noise and not to forget the additional traffic congestion. There appears to be no coherent strategy for managing any adverse effects from increased LGV and HGV movements.

Warrington will become a Town surrounded by an LGV and HGV commuter belt which will ultimately strangulate Warrington and further increase the current unacceptable air pollutants that already have an adverse effect on resident's health and wellbeing.

10. Air Quality

Over the past 12 months Stockton Heath Parish Council has been monitoring the quality of air within their village. The data reveals that during peak periods contaminates (PM2.5 and PM10 – harmful to public health and the environment) are considerably higher than the current World Health Organisation (WHO) recommendations. It must be stressed that the readings included 'COVID' lockdown periods and it is therefore reasonable to assume the results would have been significantly **HIGHER**. Based upon this information it is also reasonable to assume that Latchford Village, which the A50 runs through, will also have similar levels of pollutants as HGV traffic is considerably higher in this location.

The Council are aware of the landmark Coroner's decision in December 2020 in reference to the death of 9 year old Ella Kissi-Debrah in 2013 due to acute respiratory failure that was attributable to the exposure of air pollution. The Coroner said Ella was exposed to nitrogen dioxide matter (PM's) pollution that was in excess of WHO guidelines, the principal source of which was traffic emissions. This legal precedent is

a seismic shift towards the pace and extent Government, Local Authorities and Clinicians must work together to tackle the country's air pollution health crisis.

Based upon the above how can the Council put forward the PSVLP21 which will add thousands upon thousands of vehicular movements daily onto the A49 and A50 which will further exasperate air pollution issues in both Stockton Heath and Latchford villages? The Council have a duty to take reasonable care in ensuring and safeguarding the health and wellbeing of its residents and any decisions or actions by a Local Authority must not be in isolation of these key parameters. These proposals are unethical and not in line with the Governments Clean Air Strategy 2019.

11. Planning/highway infrastructure issue

Over the past 40 years major development has taken place in South Warrington without the original planned highways infrastructure. Development has mainly taken place on land which was zoned for development under the 1973 Warrington New Town Outline Plan – this following the New Town designation in 1968.

This rezoning went hand in hand with the provision of a proposed 'North-South expressway' proposal, involving a new High Level Bridge (HLB) across the MTC – this road running south to the M56 Junction 10 at Stretton roundabout and north to connect two East-West routes. Its purpose was to serve the new proposed development and to avoid and relieve North-South/South-North traffic congestion particularly on the A49 (through Stockton Heath) and also the A50 (through Latchford) plus the Lumb Brook Road/Cantilever Bridge route.

This road proposal was integral to the rezoning proposals – to the extent that, at the 1972 inquiry into the Outline Plan, the Highway Authority (Cheshire County Council) stated that no more than 1,000 houses should be permitted south of the MTC in advance of completion of the North/South expressway/HLB proposal. Cheshire County Council Highways Authority slightly revised its position in the '1977' County Structure Plan by stating that, until the North/South expressway/HLB was built, development should be restricted to a level consistent with the capacity of the existing highways and bridges.

The 1,000 houses threshold was actually reached in 1980 – some 40 years ago. Since that time further major housing development has taken place as follows;

- Hundreds of further new houses circa 1,500 have been built in the Dudlows Green, Pewterspear and Grappenhall Heys etc (without the N/S expressway/HLB)
- There are a further 800 outstanding permissions now currently being built (Appleton Cross and Grappenhall Heys)
- The PSVLP21 proposes an additional minimum 2,400 houses in the area during the plan period, with potential for a further 1,800 beyond that period.

• The PSVLP21 also proposes a major new employment area (6/56) which will place substantial traffic (HGV's,LGV's, and cars) onto the already over loaded Local Highway network.

The PSVLP21 does not include any highways proposals to relieve the A49, A50 and Lumb Brook Road/Cantilever Bridge routes. It only refers to a 'potential' further crossing the Ship Canal (in the same position as the original Warrington New Town Outline Plan plan) to support 'later' phases of development towards the end of the Local Plan period

In terms of the current traffic situation, as an example, morning peak hour traffic in Lumb Brook Road backs up from the Grappenhall Road junction nearly as far as Witherwin Avenue (with a 20 minute wait to reach Grappenhall Road). This situation will considerably worsen when the remaining 800 houses (already committed under existing planning permissions) are built and occupied.

To allow and propose continued developments of such scale, without the original planned and/or adequate highways infrastructure, runs contrary to the whole principle or orderly planning.

12. Conclusion

In summary PSVLP21 Local Plan is UNSOUND and does not make adequate provision for transport infrastructure between the proposed new SEWUE and Stockton Heath/Warrington Town Centre. The most likely result would seem to be that the development takes on the status of a dormitory Town; the precise opposite of the Council's stated objective. In addition the proposals of LTP4 are at best speculative with little substance and limited detail to support them. Its current soundness and deliverability exposes the very foundation of the PSVLP21 and ultimately fails to serve the residents of Warrington, specifically those residing in South Warrington.

Appendix 1 list a series of key questions that must be answered by Warrington Borough Council in regards to both the PSVLP21 and the adopted LTP4.