



Local Plan, Planning Policy and Programmes,
Growth Directorate,
Warrington Borough Council,
East annexe,
Town Hall,
Sankey Street,
Warrington WA1 1HU

**Ref: Response to the Updated Proposed Submission Version Local Plan 2021 (UPSVP21)
Response No. 4 – Transport and Accessibility**

Dear Sir / Madam

In response to the local plan public consultation, I wish to submit my responses and objections to the local plan specifically addressed to policy:

- **MD2.3 Clause 27 – South East Warrington Urban Extension – Transport and accessibility.**

The response and objections below are specific to the effect of the Local Plan proposals upon the village of Stretton. However, a separate submission by the Rethinking South Warrington's Future (RSWF) group covering the general failure of LTP4 to provide sustainable transport links to south Warrington must be read in conjunction with this response letter No. 4.

The purpose of this objection appertains to:

- a) Highlight the flawed proposals to solve congestion at the Cat and Lion traffic light junction.
- b) Highlight the flawed concept to connect the Strategic Infrastructure Road (SIR) to the A49 at the Fir Tree Close junction.
- c) Highlight the developer request for WBC to release green belt land to enable the funding of the Strategic Infrastructure Road (SIR).
- d) Highlight the historical precedence to solutions of former Unitary plans for an SIR.
- e) To suggest an alternative connection of the SIR at M56 J10 with supporting Highways England options.

Brief History

- 1) The residents of Stretton were first made aware of the proposal by Wallace Land Investments to build on land in Stretton in and around June 2017. This is when the Stretton Residents Association was formed in an attempt to protect our green belt and raise awareness of the proposal within the community. At this time, it was perceived that any connection from the A49 was purely to provide local service access to the proposed Wallace residential development. There was no evidence that this service road was to be matured into a full Strategic Infrastructure Road (SIR) to facilitate the wider WBC adopted LTP4 Transport Strategy (Dec 2019).

- 2) Since then, WBC has issued the PDO, Preferred Development Option in 2017 which included the *South Warrington Urban Framework - Issued June 2017*. Following severe criticism by south Warrington residents pursuant to the Consultation period resulted in the issue of the Submission Version of the SVPLP, which included the *Warrington Garden Suburb Development Framework – issued March 2019*. This has now resulted in the current issue of the UPSVLP21 which includes Policies MD2 and MD6 appertaining to the revised plans for the *South East Warrington Urban Extension (SEWUE)*. All of which have a catastrophic effect on the Village of Stretton.
- 3) This letter of objection No.4 should also be considered along with my objection letter No. 3, Financial Gain, as they are both inextricably linked, however, the letters are submitted separately to give clarity to the individual aspects of the objections.

1. Wallace Land Investments Proposal

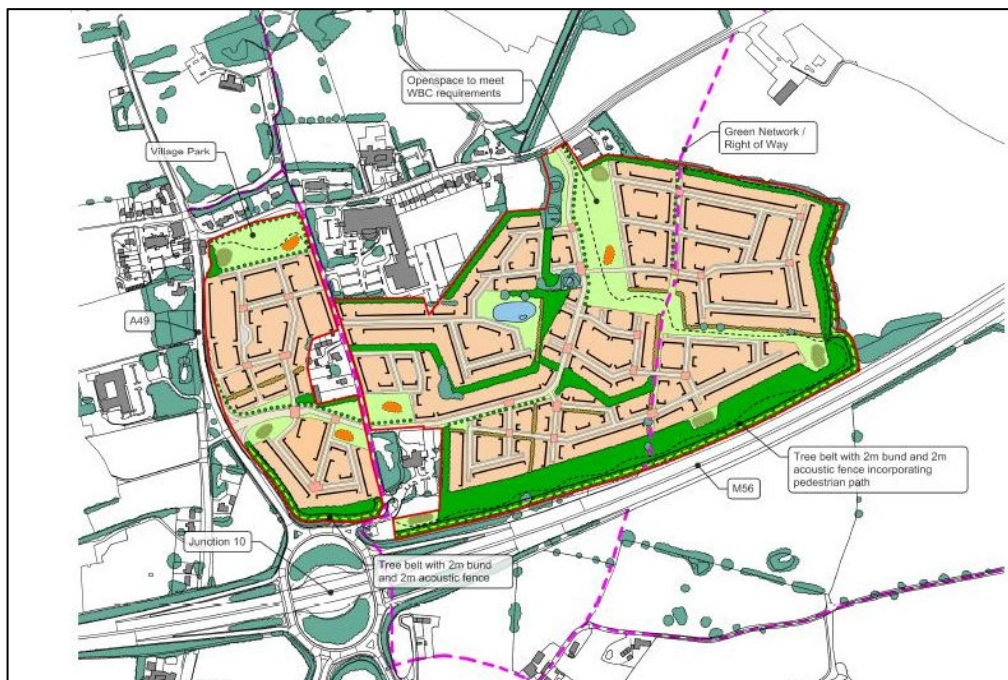
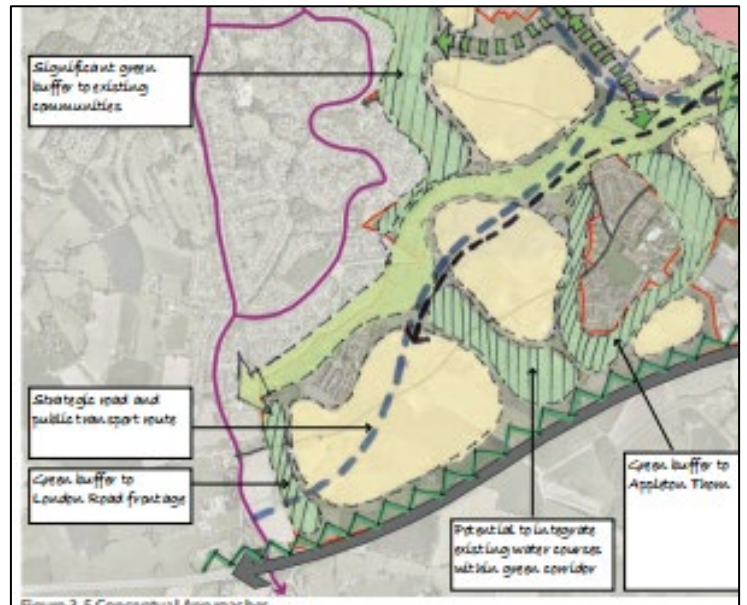


Figure 1 – Wallace Revised Proposal (circa 2019)

- 4) It can be seen from Figure 1 that an indicative green dotted line runs through the proposed residential development as a service road to both halves of the development. There is no indication that this road would become a high specification highway suitable for HGV traffic during the maturation of the local plan.

Figure 2 – PDO conceptual approach (2017)



5) Figure 2 above clearly shows conceptual route of the Strategic Infrastructure Road (SIR) starting at a point off the A49, approximately at Fir Tree Close (Spire entrance) and servicing the residential area and now being classed as a high specification link road connecting M56 J10 all the way through to the A50 as it approaches M6 J20. This link will become a route for HGV's from M56 J10 to the Barley Castle trading estate and the proposed 6/56 commercial development. This will result in commercial traffic travelling through residential areas, as can be seen in figure 3 below. It will run past proposed new schools and community neighbourhood areas. This clearly will result in additional noise and air pollution in the residential areas. **This is an unsound solution.**

Figure 3 – Framework Plan
(Land use plan)



2. Strategic Infrastructure Road (SIR)

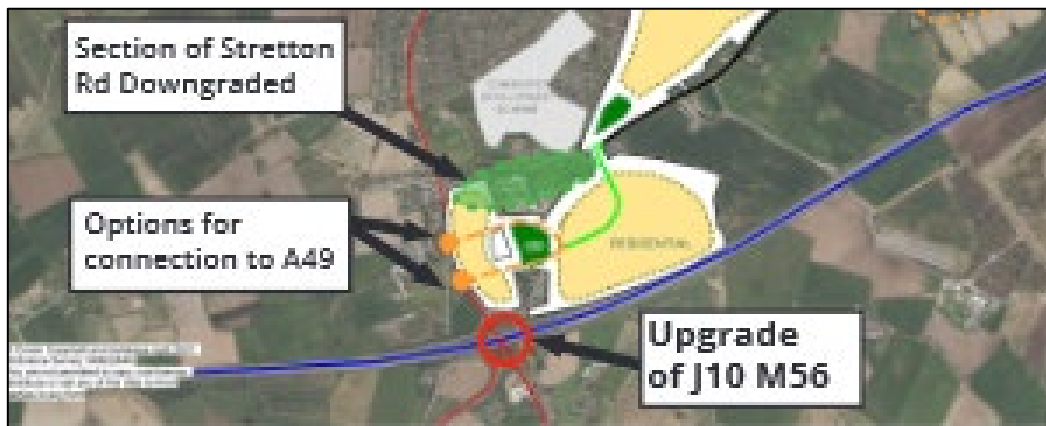


Figure 4 – SIR connection point options (2021)

2.1 Cat and Lion Congestion proposal

- 6) The current proposal, as shown in Figure 4 above, to connect the SEWUE enabling infrastructure of the SIR to the A49 is **flawed and unsound**. The proposals are defined in Section 5.34 on page 42 of the Transport Model Testing July 2021 is stated as below:

' The SEWUE enabling infrastructure considers the following:

-

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 Witherin Avenue and Dipping Brook Avenue – The "D"

-

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

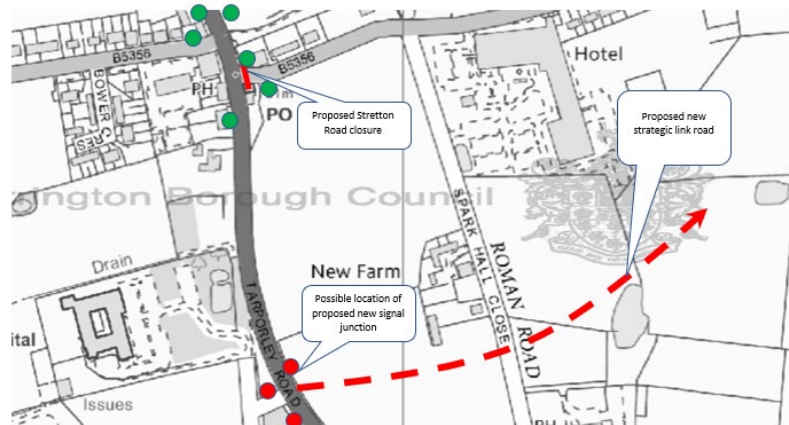
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Traffic enforcement within Appleton Thorn Village to deter 'rat-running' through the local village and encourage traffic to remain on the supporting infrastructure.'

- 7) It is noted that 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.
- 8) This enabling infrastructure proposal is 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 the emergency services accessing local residents.

- 9) 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.
- a) It is unclear as to why the A49 round about junction at Longwood Road needs upgrading at an indicative cost of £1.06M (IDP) (developer financed). This roundabout functions well and does not present any traffic congestion.
 - b) It is unclear as to why the traffic signal junction at Lyons Lane needs upgrading at an indicative cost of £2.83M (IDP) (developer financed). This signal junction functions well and does not present any traffic congestion
- 10) The main problem with the Cat and Lion signal junction, other than traffic density, is introduced by A49 southbound traffic turning right into Hatton Lane. The carriageway is not quite wide enough for two lanes and hence traffic turning right presents a blockage to traffic wanting to continue south hence creating congestion. Alleviation of this problem by introducing a right turn lane will significantly reduce congestion at this point and allow free traffic flow southbound. On close scrutiny this is entirely possible and the refusal of WBC to consider this is linked to the connection point and funding of the SIR.
- 11) It must be noted that there is not enough space for two defined lanes available for northbound traffic at the C & T traffic lights. Traffic already forms two lanes at this point, therefore a dedicated more suitable turn lane for traffic turning into Stretton Road needs to be provided.
- 12) The WBC new proposed signal junction for the proposed SIR, possibly located at Fir Tree Close / Spire Hospital entrance, as shown in figure 5 below, will most probably introduce further delays and congestion to increased traffic flows. This new signal junction will be approximately 300M from the C&L signal junction, and as close coupled signals will undoubtedly provide timing issues, as which is exemplified in Stockton Heath village, it will result in additional congestion and backing up to M56 J10. (Note that two options are shown on the WBC drawing in figure 4 for this connection)

Figure 5. Indicative Cat & Lion junction proposals.



- 13) The ‘Stopping up’ of Stretton Road with the existing junction with the A49, as preliminarily shown in red, is a flawed and **an unsound proposal** for the following reasons It may be that WBC relocate this barrier: -
- A) It will prohibit local village traffic easily accessing the school and extend journey distance.
 - B) It will prohibit local village traffic accessing the Church and extend journey distance.
 - C) It will prohibit traffic accessing the Park Royal Hotel and extend journey distance.
 - D) It will prohibit local residents accessing their residencies and extend journey distances.
 - E) Traffic wishing to cross the A49 from Stretton Road into Hatton Lane will be prohibited and will extend journey distance.
- 14) This all means that even more traffic will be using the A49 travelling south between the C&L junction and the proposed new signal junction for the strategic distributor link road.
- 15) It must be noted that this proposal is in contravention to the adopted Local Transport Plan (LTP4 Dec 2019) by increasing journey distance, increased air pollution, increased noise and totally to the detriment of the local community.
- 16) The stopping up of Stretton Road will also result in an increase reaction time to the emergency services. This is a blatant health and safety issue for local residents.
- 17) This new SIR, also referred to as the Cat and Lion Bypass or relief, is planned to meet up with the proposed new link roads between Witherwin Ave and Dipping Brook Ave, and Grappenhall Lane to Barleycastle Lane. This is defined in the Transport Model Testing document July 2021 as show on the map in figure 6 below.

Figure 6. Link road Connectivity (2021)



- 18) This has very serious implications for Stretton village and the rest of the proposed SEWUE as it opens up direct HGV access rat run between the M56 junction 10 and the propose 6/56 development and the whole of the Barley castle trading estate, thus bypassing the M6 J20 and therefore the current 7.5tonne vehicle weight restriction at Appleton Thorn. It is clearly against the guidelines and principles of LTP4 to allow HGV access through residential areas. This SIR needs to be weight restricted or suitably signed to prohibit HGV access to Barleycastle trading estate and 6/56.
- 19) The route highlighted in red in Figure 5 above and as indicated by the two options shown in yellow as see in Figure 6 are flawed in concept. They will undoubtedly result in additional congestion along the A49. Furthermore, to block off Stretton Road is completely detrimental to all users of the village facilities.
- 20) Furthermore, in recent conversations with WBC highways staff the question of phasing of the SIR delivery was raised. It was suggested that the first part of the SIR would be delivered by 2026 over the western R18/088 land parcel and that it would terminate at Spark Hall close. The second part of the road would be delivered at some future time to suite residential development phasing. The intention would be to open up and rework Spark Hall Close as a relief bypass for the Cat and Lion junction. This is completely unacceptable to the residents of Spark Hall Close, which is a sleepy no through road and enjoyed by many local walkers between the two halves of the village. It will destroy the popular thoroughfare. Planning is supposed to enhance the environment, not totally destroy it. **This is a completely flawed concept and a totally unsound solution.**

3. Alternative SIR location

Proposed amendments to the original Wallace plan

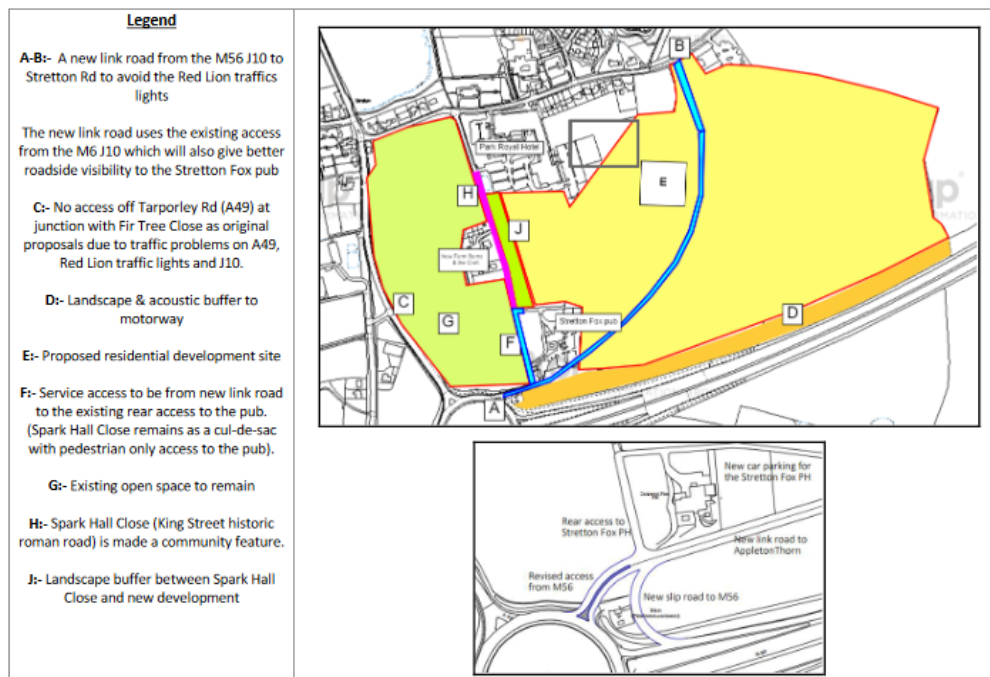


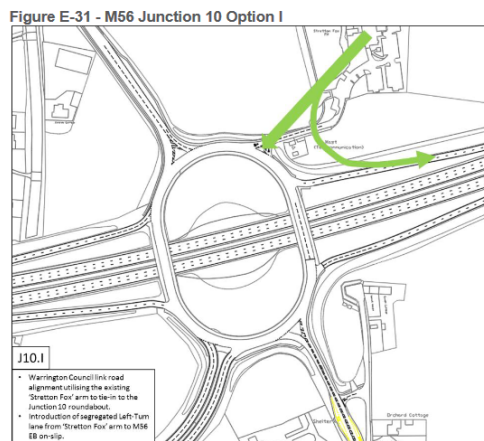
Figure 7 – Alternate Enabling Infrastructure SIR connectivity

- 21) There is of course another solution which has been tabled in the responses to the PSVLP (2019), and previously discussed with WBC officers through correspondence. That is to utilise the existing junction off J10 of the M56 as per the plan in Figure 7 above and marked in blue.
- 22) The adoption of this solution would:
1. Involve minimum or no disruption to the A49.
 2. Provide a bypass solution to the Cat and Lion congestion.
 3. Not need the requirement to block off Stretton Road.
 4. Provide better access to the front and rear of the Stretton Fox establishment.
 5. Provide developer access to site R18/088 East (shown in yellow).
 6. Site R18/088 West can be retained as green belt and remain as a characterful entry into Stretton.
- 23) To further this solution for the connection to the J10 island, there is already a line item under 'Transport' included in the Infrastructure Delivery Plan 2021 for J10 improvements to the value of £5M which could contribute to the solution.
- 24) Although WBC have previously maintained that they will not get involved in National Highways proposals for this J10 island, it has recently been divulged in conversation with WBC transport officers at the Consultation event that WBC and National Highways have co-opted together to deliver a solution for M6 Junction 20, Cliff Lane link and small island to facilitate improved access for the 6/56 commercial development. So why is not the same interaction taken over a solution for M56 J10 and the SDR. However, since that conversation

the following has come to light through a Freedom of Information request as in the paragraph below.

- 25) The Highways England Baseline Report on J20 M6 and J10 M56 (Oct 2018) discusses various options to accommodate the deficiencies of the Cat and Lion junction and how modifications to M56 J10 can solve the problem. WBC has been given this report. It basically mirrors the suggestion we have previously given to WBC as in figure 7 above.
- 26) Using this Highways England extract from Appendix E Option I solution, as shown in Figure 8 below, would provide a simple solution to solve the Cat and Lion junction problem. Allow the R18/088 West land parcel to remain in the green belt, and provide service road access to the proposed residential development on R18/088 East.

Figure 8 – Highways England Option 1



- 27) It must be noted that in the 1973 WBC New Town plan it was intended to solve the North / South infrastructure problem that a new Expressway was proposed. This in fact started at Junction 10 M56. This surely sets a precedent that the solution can be delivered using the J10 roundabout exit purely used for the Stretton Fox pub.

4 Design Manual for Roads and Bridges (DMRB)

- 28) The following are extracts from the National Highways Design Manual for Roads and Bridges (DMRB). It should be noted that the proposed SIR defined in the current maps, running through residential areas is an **unsound and unsuitable** proposal as it does not comply with the general principles of good road design as highlighted below. This proposed SIR will inevitably be an alternative route for heavy goods vehicles accessing the Barley Castle Trading Estate and 6/56 from M56 Junction 10.
- 29) This will clearly be to the specific detriment of Stretton village and of the wider SEWUE residential areas. This strategic route through a residential area has not been prepared taking into account items highlighted in bold red or through discussion with the local

community. Severe criticism was levelled at the SIR route in the 2019 consultation to which nothing has changed in 2021.

GG 103 Revision 0 4. Goals of sustainable development

4. Goals of sustainable development

4.1 The goals of sustainable development shall be delivered throughout the design lifecycle.

4.2 The goals of sustainable development require that the design shall aspire to:

1) improve the health, safety and wellbeing of those affected by road infrastructure;

2) improve land, water and air quality;

3) support a sustainable economy;

4) represent good 'whole life' value across the design life of road infrastructure;

5) embrace innovation;

6) reduce inequalities and ensure access to all;

7) use responsibly sourced materials that minimise adverse impacts on people and their environment;

8) be resource efficient and reflect a circular approach to the use of materials;

9) minimise greenhouse gas emissions;

10) be resilient to future climate change;

11) protect, and where possible enhance, the surrounding environmental and cultural context;

12) be shaped by the opinions of communities and road users.

4.3 Where additional goals of sustainable development have been identified by the Overseeing

Organisation, these shall be delivered throughout the design lifecycle.

GG 103 Revision 0 Appendix E/A. Principles of good road design

Appendix E/A. Principles of good road design

E/A1 Principles of good road design.

2: Good road design is inclusive

Inclusive environments facilitate dignified and equal use by all. An inter-disciplinary design process

involves and places people's needs and views at its heart, nurturing well-being and creating a shared

*sense of ownership of the road. **All users and communities are considered carefully** in order to reduce*

barriers to access and participation, particularly mindful of the most vulnerable..

4: Good road design fits in context

The aesthetic quality of a road and its design in relation to the places through which it passes, is

*integral to its function and the experience of those that use it. **Good road design demonstrates***

***sensitivity to the landscape, heritage and local community**, seeking to enhance the place while being*

true to structural necessities. It builds a legacy for the future.

5: Good road design is restrained

*Functional, but responding positively and elegantly to the context, **good road design allows for the***

expression of the character and identity of the places and communities through which a

road passes.

Good road design can enhance a sense of place and add to what we have inherited, particularly through the use of appropriate materials and traditions, but does not make unnecessary superficial or superfluous visual statements.

7: Good road design is thorough

The result of robust processes that create a continual cycle of improvement, good road design starts

*with **an in-depth understanding of people, place and context**; learning from best practice worldwide.*

The design of all elements of the road environment are considered together and integrated into a responsive design.

9: Good road design is collaborative

*Collaboration ensures roads are useful to and **accepted by the communities they serve.***

Collaborative

working requires a rigorous process that identifies dependencies and wider opportunities, and

*facilitates effective communication and engagement from the start. **Community***

engagement will be led

by a local sense of culture, place and value.

30) The following additional separate letters of response submitted by me addressing different but inextricably linked objections should be read together.

- Response letter No.1 – Non-compliance with NPPF
- Response letter No.2 – Green belt assessment issues
- Response letter No.3 – Green belt release for financial gain

CONCLUSION

It is clear that the Cat & Lion junction is problematic. However, to employ an ill-conceived work around that will severely impact on local residents by actually increasing traffic congestion, especially down Spark Hall Close and forcing local traffic to take a longer route is absolutely outrageous and does not take into consideration local residents. It is against many important ecological and environmental principles and guidance.

The simple and most effective solution is to use M56 J10 Stretton Fox exit, the old A559 Northwich Road exit as suggested previously. Monies have been identified in the Infrastructure Development Plan for various A49 and local road upgrades and many of these unnecessary roadworks should be abandoned and the monies diverted to this simpler and more effective solution.

This solution also needs to remove the unethical proposal for WBC to release green belt to a developer such that the developer will fund the SIR. The main advantage to this solution is that land parcel R18/088 West will be retained as green belt and will provide an enduring open countryside aspect to our lovely village. **The current proposals are unsound.**

Yours Faithfully

[Redacted Signature]

John E. Appleton

[Redacted Address Line 1]

[Redacted Address Line 2]