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Local Plan,
Planning Policy and Programmes,
Warrington Borough Council,
East Annexe,
Town Hall,
Sankey Street,
WARRINGTON,
Cheshire WA1UH



Dear Local Plan Team,

I submit my comments and criticisms of the Warrington Local Plan 2021 which I am sure you will consider and modify the plan accordingly. I have read the plan documents (there is a lot to read and cross-reference) as carefully as I can and thus my comments, although detailed, are strategic in nature

Just to inform you that I am Warrington born and bred and am deeply attached to the town. During my professional career, I was an active member of Warrington Civic Society (now defunct) and responded to many planning issues in Warrington on behalf of that Society. I was also involved in other planning campaigns and drafted a conservation area designation report for Stockton Heath Conservation Area which was later adapted and adopted by Warrington Borough Council.

In my submission, I am going to contend that in certain strategic policy issues of the Warrington Local Plan 2021 and LTP4 make the Local Plan impractical, un-deliverable and **unsound**.

These themes and issues of my submission are:

- 1) Lack of co-ordination between the Warrington Local Plan 2021 and the Local Transport Plan 4
 - The inadequacy of LTP4 2019
 - Lack of data on predictive traffic modelling, modal splits and traffic assignments to roads.
 - Road Congestion: North South Journeys, impact of the Western Link
 - Impracticality of constructing dedicated Rapid Transit + Public Transport Routes
 - Existing roads and bridges in south Warrington should define maximum development in south Warrington. [NPPF-2021 Sustainable Transport: paras: 104a,b,d,e, 105,, 110d,,111,113]
 - Transport Travel Modes and Housing Form
 - Strategic traffic issues with the proposed Western Link
- 2) Building Harmonious and Balanced Communities
 - House types for families and older people
- 3) Historic Built Environment and Urban Design
 - The erosion of historic Warrington
- 4) Demonstrating the commitment to delivering the policies on the Historic Built Environment.
 - The capabilities of Warrington Borough Council to deliver on its policies.- its track record
- 5) Countryside Setting and the Greenbelt
 - Quality
 - Limits to development imposed by preserving the Greenbely and the existing roads

I would like to be given an opportunity to speak at any open enquiry to advocate my comments and criticisms, if that is possible.

Yours sincerely,



James R Gibson,



Criticisms + comments on the Local Plan 2021 + Local Transport Plan 4

1: Lack of Co-ordination between the Local Plan 2021 + Local Transport Plan 4

One of the most striking features of the Warrington Local Plan 2021 document is the lack of thorough assessment of the potential physical impact of the Local Transport Plan 4 (2019) upon existing inflexible road networks, limits to development in south Warrington and upon the quality of the built environment. The Local Plan 2021 and LTP4 are, in theory, intimately linked and yet the environmental **impact** of this relationship is not taken into account nor properly considered.

The physical and environmental impact of transport provision, especially roads, buses and rapid transport which generate heavy building construction, potential road widenings and civil works is not mentioned in the principal document. Yet, because of Warrington's location, these issues are very severe but are not resolved in either the Local Plan 2021 or LTP4-2019

The inadequacy of the Local Transport Plan 4 as part of the Local Plan 2021

Both the Local Plan 2021 and LPT4 show no evidence of any traffic modelling for vehicle assignments to highways for Warrington and its sub-region...Any traffic modelling for Warrington and its sub-region should take as its basis the severe limitations of existing physical capacity of the roads such as severe congestion, extreme traffic delays, destructive road widening, road works, slip-roads, etc. No amount of traffic management will solve this problem..

- LTP4 shows no substantive traffic or journey volumes as predicted movement desire lines
- not based on validated and predicted modal split journeys to be assigned to i) dedicated rapid transit routes, ii) potential tram or bus routes on existing roads or iii) private car journeys
 - does not take into account the full practicality or acknowledge the considerable constraints of its waterways and rail-lines as limits to road construction or development

In other, words, the **existing roads, streets, lanes, bridges and junctions in Warrington and particularly in south Warrington should set and define the absolute limit to future traffic generation, traffic flows and capacity including any bus and tram lanes and development in south Warrington.**

LTP4 has not demonstrated that it is capable of delivering or implementing the required transport proposals: indeed, it has avoided this issue. It has no practicality strategy and is, therefore, inadequate and unsound.

Local Transport Plan 4:

Existing road capacity: Defining the limits to development in South Warrington

[NPPF-2021 Sustainable Transport: :paras: 104a,b,d,e, 105, 110d,111,113]

RESUME:

The above paragraphs outline the importance of the effect and limits of the capacity of the highway network upon the limits to development, particularly in south Warrington. These are especially relevant to current and future development of housing and employment in south Warrington.

It is quite clear that neither the Local Plan 2021 nor LTP4 have addressed these future strategic issues since there is little or no substantive predictive modelling and highway traffic assignments data to the existing network. The existing road networks in Warrington including south Warrington are incapable of substantive widening to accommodate future traffic volumes.

This inadequacy means that the highway network will not be plan led as required by the NPPF 2021, but rather a **case-by-case** or **crisis/problem** led. *LTP4: Vision and Policies: Parts A+B: Network Management: para:14.2* mentions that under the *Traffic Management Act 2004* local authorities are 'to secure the expeditious movement of traffic on the authority's roads'. The Local Plan 2021 or LTP4 do not specify the practicalities as to how this will be achieved.

Most importantly, there are severe traffic capacity limits on the existing roads in south Warrington and the severe physical and constricting obstacles between north and south Warrington, namely:

- the Bridgewater Canal and its single lane, listed bridges at
 - Walton Bridge
 - Hough Lane Bridge
 - Red Lane Bridge
 - Lumb Brook Aqueduct and
 - Grappenhall (unlisted)
- the Manchester Ship Canal: 3 no swing bridges and high-level cantilever.
- the River Mersey: fixed bridges

The limits on increased development in south Warrington should be restricted to the transport capacity imposed by the existing, inflexible roads where road congestion is severe. Warrington Borough Council appears to continue giving planning permission to yet more houses without considering these constraints.

DETAILED COMMENTS and CRITICISMS:

It is clear that the existing capacity of these narrow roads is nearing severe peak-time congestion conditions creating irate frustration for drivers. (64% of drivers/stakeholders mention congestion as a major issue)

In *LTP4 Evidence Base Review*; Fig.38: June 2015 – Trafficmaster Average Speeds AM Peak attests to this acute congestion. Fig. 57 illustrates the huge inflow and outflow of traffic from Warrington. *Section 4: Transport and Travel. Para 4.1 Transport and Travel* key findings and implications further support the dire traffic and travel situation in Warrington: particularly car dominance, poor journey times and congestion.

- The associated Local Transport Plan 4 (LPT4 2019) is strong on analysis of existing traffic conditions, but it is very weak and, at best, policy driven and aspirational in terms of predicting and accommodating future traffic for both vehicle and mass transit ambitions. There are no definitive predictions of generated traffic. Movement desire lines are indicated between employment and housing areas, but are not translated into potential future modaly split traffic volumes which are then to be assigned to the road networks to indicate potential congestion.
- Both the Local Plan 2021 and LPT4 show no evidence of or any reference to any predictive traffic modelling or vehicle road assignments for Warrington and its sub-region..Any traffic modelling for Warrington and its sub-region should take as its basis **NO CHANGES** or **WIDENINGS** to the existing physical capacity of the roads such that there will be minimum congestion, minimum delays, no destructive road widening, road works, slip-roads, widening of existing bridges. In other, words, the **existing roads, streets, lanes, bridges and junctions in Warrington should set and define the absolute limit to existing traffic flows and traffic capacity. They should also define the maximum amount of development in South Warrington**
- The whole north-south vehicular movement is severely inhibited by the Bridgewater Canal and its 4 **listed** single lane and 1 unlisted bridges, the Manchester Ship Canal, the River Mersey, Liverpool – Manchester Railway Line and the London-Glasgow Railway Line. Any new bridges, roads, road widening, and civil engineering works are likely to be so destructive, intrusive and so prohibitively expensive such that they will never be built thus making the increased development south of the Manchester Ship Canal completely **un-sound** and **un-viable**. [Warrington New Town Corporation had recognised the same problem. It proposed the North-South Expressway which was not built and therefore inhibited any serious development to the south of Warrington]

Road-works, bridges and civil engineering works:

There are no illustrations or indications of the precise routes and details of the future required road-works and bridges proposals addressing the north - south traffic traversing the Bridgewater Canal, the Manchester Ship Canal, the Mersey and Cheshire Lines railway which would require massive, disruptive, very expensive bridge-works. These would render the transportation plan grossly invasive, **un-sound** and **un-deliverable** and **un-economic**

The road-works, bridges and civil engineering works (not described or illustrated in the Local Plan 2021 nor in LPT4) required for the implementation of the Local Plan throughout Warrington (south, north east west) are potentially disastrous in terms of the quality of environment

Un-controlled new housing in south Warrington will create even more intense traffic congestion and pollution throughout the town thereby negating any benefit which might accrue from the proposed Western Link to the town centre.

The Local Plan 2021 for Warrington would increase pressure for road widening and engineering works to accommodate increased traffic: However, road widening does not ease congestion; it merely makes the route more attractive to motorists who then fill up that road to congestion capacity thereby making the environment and congestion much worse without solving the problem.. Deterrence is the only solution.

The potential impact of the Western Link (Walton – Great Sankey – Westbrook)

The enormous effect on traffic of the proposed Western Road Link from Walton to Great Sankey (Liverpool Road) and thence Westbrook (Cromwell Way) upon the existing road networks will be calamitous both for road congestion and environmental quality. It will attract and generate enormous amounts of traffic from south Warrington putting even more pressure on the road network on south Warrington particularly the narrow lanes and two lane roads. More traffic will be encouraged from Grappenhall, Thelwall, Lymm and the M6 along Grappenhall Road, Walton Road via Stockton Heath Village to the Stag Inn junction. And there will be added traffic from Daresbury.

This potential congestion, increased volume of traffic does not appear to have been modelled or tested on the predicted and existing network. It could create traffic levels along Grappenhall Road and Walton Road similar to pre-M56 days. If the Western Link is proposed to be built, traffic modelling, highway assignments and management to discourage and limit congestion should be a preliminary and discussed with those residents and concerned citizens directly and indirectly affected.

Impracticalities of the construction of Mass + Rapid Transit routes in Warrington

The proposed Mass Transit Transportation Plan is aspirational and diagrammatic and does not represent a physical reality. It is unrealistic and not based on predicted and substantiated origin + destination travel data. Furthermore, employment and residential densities are too low to make mass transit viable.

Dedicated north- south road traffic and mass transit routes (if proved viable) cannot be constructed without huge disruption, huge civil engineering works and demolition because of the same water-way and rail impediments which also affect private car travel: i.e Bridgewater Canal and its listed bridges, the Manchester Ship Canal, the River Mersey, the Cheshire Railway and the Glasgow – London railways

Thus, civil engineering works required to accommodate north-south transport are virtually impractical and un-economic and are an obstacle to development in the south of Warrington. This is not addressed by the Local Plan 2021 or LPT4 and renders the Local Plan 2021 **unsound**

Impact on M6, M56 and M62 motorways:

The impact of the development in south Warrington upon the M6, M56 and M62 motorways will be environmentally destructive and impractical adding to the already heavy congestion on these motorways and their junctions..

The road and civil engineering works required to accommodate the increased traffic do not appear have been fully detailed to illustrate their huge destructive impact. The volume of traffic generated by south Warrington housing and employment will add to further increased congestion. Some people who choose to live in a south Warrington expansion will might intend to work in Manchester, Liverpool, Chester and north Cheshire, not Warrington adding further congestion. Furthermore, there is likely to be a huge increase in HGVs adding more to congestion and pollution

The environmental degradation, increased congestion and prohibitive costs of construction make development in south Warrington unpleasant, undeliverable and, therefore, **unsound**.

Transport Mode and Housing Form:

The intimate relationship between housing location, built form, density and social mix is not properly addressed. The LTP4 expresses many aspirations about the shift from private car to public transport of buses and rapid transit, but the Local Plan 2021 does not detail the importance of housing form and density, particularly as it affects south Warrington. Housing location, form and density strongly influence the choice and convenience of public transport.

Typically, the current, fashionable, 'swirly' access roads, low density dwellings estates being currently built in south Warrington are inimical to the use of public transport. If Warrington Borough Council wishes to encourage the use of public transport, then it must enforce more stringent conditions and controls on developers to build in favour of public transport e.g., higher densities, direct and convenient access to frequently located bus stops, linked cycle ways and footpaths..

Conclusion to this section:

The un-economic costs, impracticality, environmental damage of building roads, bridges and civil engineering works to access north Warrington from south Warrington makes both the Local Plan 2021 and LTP4 wholly impractical and, therefore, unjustified.

The Warrington Local Plan 2021 and LPT4 are both aspirational and are not closely integrated. The potential destruction of important historic assets in south of Warrington render increased development in south Warrington to be destructive to the environment, impractical and therefore **un-sound**.

The Bridgewater Canal, the Manchester Ship Canal, the River Mersey and the Cheshire Lines Liverpool – Manchester present huge obstacles and costs to developing any new bridges or dedicated mass transit lines. The land-use plan for the Warrington Local Plan 2021 does not illustrate design details of any roads, bridges, civil works and mass transit routes. Without these roadworks' details, the Local Plan 2021 and LTP4 are **un-sound, impractical and un-deliverable**

The great danger of the Local Plan 2021, as far as south Warrington is concerned, is that planning permission and government approval could be granted without the requisite road capacity, public transport infrastructure being in place and the environmental standards and quality being legally assured and enforced.

Without a detailed road-network and dedicated public transport routes which have been tested by independent computer modelling, the whole Local Plan is completely un-deliverable, incapable of being implemented and renders the plan **in-operable** and, therefore unsound.

Summary:

Future development in Warrington and particularly south Warrington, should be limited by the capacity of the existing road network and the required environmental standards in air quality and urban design.

2: Building Harmonious and Balanced Communities:

It is important to Warrington, as an attractive place to live, that housing form, distribution and provision of schools and play-spaces and social infrastructure should encourage socially mixed and balanced communities, especially for children and older people.

The Local Plan 2021 should stress the following issues.

- Houses should be designed so that they are adaptable and flexible for all stages of life viz: single people, young families, from middle to old age. This usually means two bathrooms, ease of wheeled access and future proofed for stair/chair lift.
- Space/room standards would be good. Bring back Parker-Morris space standards as a minimum.

Blocks of apartments should provide a mixture of dwelling types particularly having two good bedrooms at least so that children or guests can be accommodated. Apartments should be designed to accommodate a variety of family types for longer periods of time.

Studio or one-bedroom apartments should be discouraged. They are very inflexible, do not provide for balanced and encourage short term occupancy.

3: Historic built environment and urban design

Urban design: Heritage + character of Warrington: Town Centre, Local Centres + villages

Brief Background:

In recent years, WBC has approved a large development to replace the 1960's Market Hall in the south-east quadrant which had a multi-pyramidal roof the intention of which was to respect the historic, multi-faceted roof-scape and height of historic Warrington. The replacement market and cinema complex are bulky and very high (dwarfing the listed Quaker Meeting House nearby).

The huge car park in this development now dominates the Warrington town centre roof-scape and severely detracts from the historic character of Warrington. Furthermore, WBC permitted the construction of a large block of flats in the Winwick Street to the same effect. A similar structure in Buttermarket Street Conservation Area also dominates the skyline and rivals the principal building in the area, namely St. Mary's Church and detracts from the views into the conservation area.

Warrington Borough Council's historic, current and possible future reluctance to abide its statutory duties and powers specified in the Planning (Listed Buildings and Conservation Areas) Act 1990, the advice of the NPPF 2021 and its own historic built environment policies.

The Warrington Local Plan 2021 in paras 8.2.1, 8.2.2 and Policy DC2 affirms the importance of the historic urban and architectural heritage to the well-being of Warrington.

And yet Warrington Borough Council's past record on its statutory duty to 'preserve and enhance' its historic assets demonstrates that it has very little interest or commitment to the historic fabric of Warrington. Indeed, Warrington Borough Council, despite discussions with the then Warrington Civic Society, has allowed important historic assets to decay such that it has used the Building Acts 1986 to demolish a significant part of the Bridge Street Conservation Area namely the Water Tower, Furniture Factory and Victorian School in Cairo Street. Moreover, it continues to take no affirmative action to prevent the decay of historic buildings such as the Packet House in Bridge Street.

- By its demonstrable lack of affirmative and committed action to fulfil its **legal duties** under the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve and enhance Conservation Areas and the setting of listed buildings, Warrington Borough Council has clearly demonstrated that it is not willing to deliver its aspirations and intentions as written in the Local Plan 2021.
- The evidence is that Warrington Borough Council prefers to use the Building Acts 1986 to circumvent its **legal duties** under the Planning (Listed Buildings and Conservation Areas) Act 1990: Sections 66, 69, 71 + 72. Nor is it willing to employ the specialist expertise at principal officer level together with a dedicated conservation team to accomplish any meaningful future preservation of historic assets.

It is difficult to speculate as to the reasons for Warrington Borough Council's indifference to and neglect of its historic architectural heritage and assets. It could be that:

- The elected members and the higher echelon professionals of WBC are not interested in preserving the historic character of Warrington and possess little attachment to it
- The elected members and the higher echelon professionals of WBC have another urban vision of Warrington for which it is necessary to eradicate and demolish the architectural heritage of the town despite the wording in the Local Plan 2021.
- The administrative structure of Warrington Borough Council is focussed on 'regeneration' at all costs in which the historic environment plays little or no part. The evidence for this is
 - (a) that the planning function was reduced to a minor role in Warrington & Co in 2016
 - (b) the former senior conservation officer's post was abolished.
 - (c) the quality of development control in designated conservation areas does not seek to 'preserve and enhance' historic assets and is of very poor standards (e.g. Bridge Street Conservation Area, Winwick Street Conservation Area, Buttermarket Street Conservation Area, Stockton Heath Conservation Area, etc)

Poor Administrative Structure + Corporate Commitment to deliver future heritage policies

If Warrington Borough Council is sincerely and wholly committed to the historic environment then it should prioritise its planning functions. In the Warrington Borough Council Structure and Senior Managers (2021)(2019), 'Planning' is subsumed in 'Growth'(2021) and 'Economic Growth (2019). At least 'Planning' has been removed from the control of 'Warrington & Co. as it was in 2016. The WBC Operational Structure of 2007 was a much better management structure in which Planning functions were prioritised and its associated services such as Transportation and Building Control were more integrated and harmonised under 'Environment Services Directorate'

Importantly, the Conservation Officer's function should be re-instated at **principal officer** level. He/she must have a **dedicated team** of a team of qualified and accredited conservation professionals. Political support of Members on the Council should be made paramount

In recent years, WBC have relied on private conservation professionals, but these are employed by developers or private individuals on whom they rely for payment. Such individuals do not speak for the historic assets themselves, they are employed to advocate their client's cause or Warrington Borough Council's own intentions for the demolition of its own historic assets. e.g. Stockton Heath Junior School.

Warrington and the Town Centre still has many of fine historic buildings, conservation areas and spaces: Bridge Street, Buttermarket Street, Palmyra Square + Queens Gardens and the Town Hall, the Transporter Bridge, together with the spires and towers of its churches. These are important historic assets that people value and which reflect the historic character of the town. Townspeople are keen that these assets be conserved and their settings positively enhanced as part of the regeneration of the Town Centre. Warrington Borough Council does not appear to have formulated any recent Conservation Management Plans or used development control powers to 'preserve and enhance' its conservation areas.

Around Warrington there are attractive villages (Lymm, Grappenhall, Hatton, Daresbury, Stockton Heath) which are also highly valued, but, there are no conservation management plans or sympathetic urban design briefs

The Local Plan 2021, Chapter 8.2 is replete with laudable intentions and indicates that it will prepare a conservation strategy and conservation management plans. But, despite public dismay and out-cry, WBC has not demonstrated its sincere commitment to urban conservation as a basis for urban design and enhancement of local character. It has recently demolished a significant part of Bridge Street Conservation Area (The Water Tower and Victorian School) and it is doing nothing to preserve the decaying buildings of the Packet House and Grappenhall Rectory.

Most importantly, it does NOT have a dedicated conservation officer at principal officer level i.e., where it really counts. The former post of senior conservation officer was deleted some years ago.

Warrington Borough Council has included a detailed list of policies to support its urban conservation intentions in the Local Plan 2021, but this is not supported by hard facts of past experience. It is difficult to believe that WBC is suddenly urban conservation friendly.

Conclusion and Recommendation:

As it stands, Warrington Borough Council's Urban Conservation Strategy and intended policies written in the Local Plan 2021 is nominally sound. However, owing to its lack of political and in-house professional expertise, Warrington Borough Council has demonstrated that it is not capable of or interested in **implementing** these policies and, consequently they are **undeliverable**,

.The Local Plan 2019 expresses the laudable policies and intentions to abide by its statutory duties and powers to preserve and enhance its heritage assets, but the present administrative structure, in house professional expertise and political commitment are inadequate.

The government or its agents should not approve the Local Plan 2021 unless Warrington Borough Council and its administration ensure and enshrine its commitment to:

- change the administrative structure such that the planning department/service is positioned in a prime position to PLAN the town and that 'regeneration' is one of many planning functions.
- employ a **principal** conservation officer who heads a team of a accredited conservation expertise (all on permanent contract) in order to preserve and enhance the historic built heritage.
- employ an urban design officer who heads a team of a urban design expertise who will respect the centrality of the historic built environment + traditional urban character.
- make sure that elected members of the Council are permanently duty bound to preserve and enhance Warrington's historic assets

Countryside Setting and Green Belt:

Building in the Greenbelt requires exceptional circumstances. In the Local Plan 2021, Warrington Borough Council has not demonstrated any exceptional circumstances except that property developers require the pristine land because it's cheaper for them.

The proposed employment areas in south Warrington are typical distribution hangars along the M6 and M56 motorways with lower levels of employment but which generate significantly increased HGV and vehicular traffic. These motorways are already operating at maximum capacity and are subject to very heavy congestion and will require junction access. Furthermore, the impact on the quality of environment will be disastrous. There will be the loss of valuable countryside, arable farming and wild-life habitat.

Summary of selected conclusions

- There is no link of practicality between the Local Plan 2021 and LTP4
- LTP4 has no substantive **predictive** traffic volumes which are to be assigned to roads in a model split; i.e. cars, buses, dedicated mass/rapid transit lanes.
- LTP4 has not specified how its policies are to be implemented and constructed. It has policies and lists of intentions, but no strategy. It has not stressed the enormity of the physical and financial constraints of
 - a) south Warrington road capacities,
 - b) the Bridgewater Canal
 - c) its four single lane **listed** bridges and one un-listed bridge,
 - d) Manchester Ship Canal,
 - e) River Mersey,
 - f) Cheshire Lines Railway (east-west),
 - g) main line London – Glasgow railway.
- LTP4 is inadequate because it has not been demonstrated how it can be implemented
- Any approved development in Warrington and particularly south Warrington (having first taken into account objections on Greenbelt grounds) should be defined and limited to that can be comfortably accommodated by the **existing** roads and bridges with the minimum of congestion

- Warrington Borough Council has not demonstrated its political and professional commitment to its historic built environment because:-
- Warrington Borough Council does not possess the in-house professional and dedicated principal conservation officer and supporting team.
- The current administrative structure of Warrington Borough Council does not give due prominence to its planning department. It puts in on equal footing with Warrington + Co.
- Thus Warrington Borough Council is currently unable to deliver the policies necessary to preserve and enhance the historic built environment and its remaining heritage assets.

The Local Plan is **unsound** because it is **not-justified** by an appropriate and practical transportation strategy, taking into account reasonable alternatives defining limits to development which are not discussed in relationship to LTP4.

The Local Plan 2021 must be **reviewed** and **modified** by the implications and omissions in LTP4 concerning the practicalities of future implementation and construction.

The linkage between the Local Plan 2021 and LTP4 is far too tenuous and hardly existent.

The Local Plan must be modified to strengthen the practical relationship with LTP4. The Local Plan 2021 must demonstrate how the plan intends to deal with the implementation, implications and practicalities of LTP4- both in detail and strategy,

The government (or its appointed agencies) should not approve the Local Plan 2021 until Warrington Borough Council has restructured its administration to give prominence to its planning service, employed in-house conservation professional conservation teams in order to be effective in delivering its historic environment objectives and policies.

Appendix:

Roads seriously affecting Heritage Assets in south Warrington

Single lane choke points and narrow lanes:

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- **Lumb Brook Road Under-Pass** (Single Lane Traffic) **Ancient Monument**
(Any widening is most likely to require the demolition of Bethseda Chapel)
- **Red Lane Bridge:** (Single Lane Traffic); **Listed Building: Grade II:**
Currently a 'Rat Run' from **Quarry Lane** and **Windmill Lane** which would increase by its cross-road connection to **Lyons Lane** all of which will function as a major traffic artery by its eastward connection to the new urban highway serving the urban sprawl.
Hough Lane Bridge: The increase in housing along Hough Lane will exert pressure to demolish.
Walton Bridge: very similar to Hough Lane.
The **Bridgwater Canal** and the Manchester Ship Canal are a considerable impediment to north – south traffic movement.

Roads + Places likely to be affected by severe traffic congestion:

Stockton Heath will experience significant increase in traffic from **both Knutsford Road, Grappenhall** (identified as a major artery via **Ackers Pit**) and **Grappenhall Road** (which will be a rat – run to **Stockton Heath**)

London Road via Stockton Heath will be experience even more Traffic

Walton Road (as an extension of Grappenhall Road) will also experience increase in traffic as it connects the above roads to the Stag Pub Junction for the proposed Western bypass to **Liverpool Road**.

Red Lane / Windmill Lane / Quarry Lane / west end of Whitefield Road, Hill

Cliffe Road will become even more of a rat – run owing to its cross – road connection with **Lyons Lane**.

Lumb Brook Road and **Bridge Lane** are defined as major arteries to connect with the newly opened (now closed) **Stockton Lane**. These three roads will converge at **Lumb Brook Bridge**.

Grappenhall Hump Back Bridge will also experience significant pressure

NPPF: Tests for soundness: Warrington Local Plan 2021

Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

Examining plans: Soundness:

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are **sound**. Plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

36. These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

End of Submission
