

From: James R. Gibson, ARIBA (SCA*), MRTPI (retd), IHBC
[REDACTED]
(*Specialist Conservation Architect)

Reasons as to why

WARRINGTON LOCAL PLAN 2019

The Local Plan 2019 should be re-assessed and re-designed in its entirety because it is wholly impractical, **un-deliverable**, un-realistic, lacks important infrastructure detail which would reveal and demonstrate its **un-soundness**. It is not integrated with LPT 4, It is **un-sound**.

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1: **PREAMBLE:**

Legislation requires that plans are “**sound**” and one of the four tests of soundness set out in the NPPF is that plans are consistent with national policy. The other tests are soundness are that the Plan is:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; and
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters.

Ministerial Forward of the NPPF states that:

The purpose of planning is to help achieve *sustainable development*. Sustainable development is about change for the better, and not only in our built environment. *Sustainable* means ensuring that better lives for ourselves doesn’t mean worse lives for future generations.

Our natural environment is essential to our well-being, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. **Green belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.**

Our historic environment, buildings, landscapes, towns and villages, **can better be cherished if their spirit of place thrives**, rather than withers.

Our standards of design can be so much higher. We are a nation renowned world-wide for creative excellence, yet, at home, **confidence in development itself has been eroded by the too frequent experience of mediocrity.**

This should be a collective enterprise. Yet, in recent years, **planning has tended to exclude, rather than to include, people and communities.** In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.

The Town and Country Planning Association ‘campaigns for the reform of the UK’s planning system to **make it more responsive to people’s needs and aspirations and to promote sustainable development**’. The Raynsford Review of Planning Aims 2017 states that ‘since 2010... planning legislation was first relaxed to accommodate housing growth....’

2) Resume: Main Issues of the Warrington Local Plan 2019:

- Housing: Plan based on un-realistic, un-substantiated targets
- Increase in urban sprawl: Land + property speculation led plan
- Loss of Greenbelt, landscape, woodland, rural character
- Loss, destruction and / or alteration of heritage assets and local character and distinctiveness e.g. listed buildings, ancient monuments, ancient woodland
- Mass Transportation Plan: Unrealistic. Not based on substantiated origin + destination data. Employment and residential densities too low. Not affordable
- North – South traffic and mass transit routes cannot be resolved without huge disruption, gross civil engineering works, demolition because of Bridgewater and its listed bridges, the Manchester Ship Canal and the River Mersey. This is a serious issue not addressed by the Local Plan 2019 or LPT4 and renders the Local Plan 2019 particularly its proposals south of the Manchester Ship Canal **un-deliverable** and grossly **un-sound**
- Traffic congestion / transportation: result in intensive and destructive road works over all Warrington both north + south. High level bridge: Latchford, Bridgewater Canal bridges and under-pass under very severe threat. Rural lane character under threat.
- Quality of place + heritage conservation. Lack of a detailed plan to preserve and enhance the urban quality of north Warrington which is divided into ‘development parcels’
- The impact of the development in south Warrington upon the M6, M56 and M62 motorways are environmentally destructive and impractical adding to the already heavy congestion on these motorways. The environmental destructiveness and huge, prohibitive costs make the development in south Warrington **un-deliverable** and **unsound**.

3) Un-deliverability:-

- The housing + population targets are far too high and have no valid justification apart from aspiration on the part of WBC. They are a WBC want rather than a community need.
- The exceptional circumstances required to permit development in the Greenbelt have not been demonstrated. The ‘exceptional circumstances’ are, in reality, the aspirations of land and property speculators.
- The Local Plan 2019 together with LPT4 has not translated the anticipated vehicle traffic volumes and congestion onto existing roads in order to illustrate in detail the required new roads, bridges, civil engineering works to accommodate this traffic. Construction and planning blight costs are speculative. These roads, bridges and civil engineering works will be hugely destructive on the existing settlements, existing roads, communities and green environment. Like the New Town beforehand, WBC is very unlikely to build these strategic works.
- The whole north-south vehicular movement is severely inhibited by the Bridgewater Canal and its listed bridges, the Manchester Ship Canal, the River Mersey and the

London-Glasgow Railway Line. The required bridges, roads and civil engineering works will be so destructive, intrusive and prohibitively expensive such that they will never be built thus making the whole increased development south of the Manchester Ship Canal completely **un-sound** and **undeliverable**.

- The associated Local Transport Plan 4 (LPT4) is strong on analysis of existing traffic conditions, but it is very weak and merely aspirational in terms of its predictions for both vehicle and mass transit ambitions. Residential and employment area densities are far too low and, together with the dispersed nature of the main employment areas, make a mass transit and effective public transport completely uneconomic, **un-sound** and **un-deliverable**.
- 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 capable or willing to deliver its aspirations as written in *Section 8.2: Warrington's Historic Environment, Proposed Submission Version Local Plan 2019, pp104-107*.
- The evidence is that Warrington Borough Council prefers to use the Building Acts to get rid of inconvenient historic assets rather than abide by its **legal duties** under the Planning (listed Buildings and Conservations) Act 1990. Nor is it willing to employ the specialist expertise at principal officer level to accomplish any meaningful preservation of historic assets.

4) Housing: Population drivers of the Local Plan 2019

The Warrington Local Plan is predicated upon the over aspiration of population increase and house building rather than real local need. Official population increase predictions require 528 dwellings per annum. The government suggested figure is too high at 909 dwellings and WBC wants 945 dwellings per annum. It appears that this plan is property speculator led rather than by community needs and environmental considerations.

5: Transportation + Road Traffic

The huge traffic / transport physical and environmental implications have been omitted from the Local Plan 2019, and are not detailed in the LPT4 documents. LPT4 documents are informative of the current traffic problems but are wholly inadequate for the future based on poor on predictions. It is virtually impossible to predict the travel implications.

Mass Transit:

The proposals for public transport and mass transit are un-realistic and, therefore, **unsound** because the residential densities and employment densities are too low. LPT4: Section 8 Mass Transit Corridor admits that the dispersed nature of the borough, with many out of town employment and retail sites in inimical to mass transit...Employment areas are too diffuse being located on the perimeters of Warrington along the motorways M62, M6 and M56. There is some employment in central Warrington, but certainly not enough to generate enough passengers for mass transit. In addition, the Local Plan 2019 cannot predict where people will live and where people will work. To make mass transit remotely feasible, Warrington Town Centre would have to accommodate more employment which means high density development i.e. the demolition of much of central Warrington and its historic character.

There are no illustrations or indications of the precise routes and details of the mass transit proposals particularly from north to south traversing the Bridgewater Canal, the Manchester Ship Canal and the Mersey which would require massive, disruptive, very expensive bridgeworks. These would render the transportation plan grossly invasive, **un-sound** and **un-deliverable** and **un-economic**

It is noted that the mass transit proposals are not proposed for south Warrington (Stockton Heath, Appleton, Stretton, Grappenhall) because the housing densities and built form (the so-called Garden Suburb) are inimical to mass transit and public transport. People who choose to live in this location are likely to work in Manchester, Liverpool, Chester and expanded villages in north Cheshire owing to the proximity of the M56; already close to full capacity.

There are no illustrations or indications of the precise routes and details of the mass transit proposals particularly from north to south traversing the Bridgewater Canal, the Manchester Ship Canal and the Mersey which would require massive, disruptive, very expensive bridgeworks. These would render the transportation plan grossly invasive, **un-sound** and **un-deliverable**

Road-works, bridges and civil engineering works:

There are no illustrations or indications of the precise routes and details of the road-works and bridges proposals particularly from north to south traversing the Bridgewater Canal, the Manchester Ship Canal and the Mersey which would require massive, disruptive, very expensive bridgeworks. These would render the transportation plan grossly invasive, **un-sound** and **un-deliverable** and **un-economic**

The roadworks, bridges and civil engineering works (not described or illustrated in the Local Plan Proposed Submitted Version 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

- Both the Local Plan and LPT4 show no evidence of any traffic modelling or vehicles assignments for Warrington and its sub-region..Any traffic modelling for Warrington and its sub-region) should take as its basis the existing physical capacity of the roads such that there will be no congestion, extreme traffic delays, 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.**
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- The new housing population will create even more intense traffic congestion and pollution throughout the town thereby negating any benefit which might accrue from the proposed western by-pass to the town centre.
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- The Local Plan 2019 for Warrington would require more disruptive road widening and engineering works to accommodate increased traffic: For example, the north – south traffic movement will considerably increase the current significant pressure on the rural lanes of south Warrington and on protected Heritage Assets on the Bridgewater Canal which will most likely 'require' their demolition or significant alteration: The threat to the rural landscape, heritage assets and lanes of south Warrington is hugely destructive: e.g.

The un-economic costs and environmental damage of building roads, bridges and civil engineering works to access south Warrington from north Warrington.

The Warrington Local Plan 2019 and LPT4 have not detailed the destructiveness of the following thereby rendering the development in South Warrington impractical and **un-sound**

Roads affecting Heritage Assets (Listed Structures, Conservation Areas + Monuments)

- 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 **Bridgewater 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 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

Importantly, the coloured land-use plan for the Warrington Local Plan 2019 (Proposed Submission Version) conveniently does not illustrate details of any roads, bridges, civil works and mass transit routes. Without these roadwork's details, the Local Plan 2019 is **un-sound and un-deliverable**

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

(In the former Preferred Local Development Plan 2017, the land-use plans indicated a sweeping major north – south arterial road along the high - level railway alignment which ends up in Latchford. This is a major highway construction with immensely disastrous environmental effects on Latchford and west Thelwall and it plugs into Latchford Road leading to Bridge Foot)

Impact on M6, M56 and M62 motorways:

The increased traffic impact of the proposed development upon the M6, M56 and M62 has been down-played. The road and civil engineering works required to accommodate the increased traffic have not been detailed to illustrate their huge destructive impact. The volume of traffic generated by south Warrington housing and employment will add to further increased congestion. People who chose to live in south Warrington expansion will most likely intend to work in Manchester, Liverpool, Chester and north Cheshire, not Warrington. Furthermore, there will be a huge increase in HGVs adding to congestion and pollution

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

6) Greenbelt and Countryside:

Building in the Greenbelt requires exceptional circumstances. In the Local Plan 2019, 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 sheds 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 the loss of valuable countryside, arable farming and wild-life habitat.

7) Urban design: Heritage + character of Warrington: Town Centre, Local centres and villages

The Warrington and its Town Centre have 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.

Around Warrington there are attractive villages (Lymm, Grappenhall, Stockton Heath) which are also highly valued, but there are no conservation management plans

The Local Plan 2019, Chapter 8.2 is replete with pious intentions and indicates that it will prepare a conservation strategy and conservation management plans. 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. 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.

It is quite clear that Warrington Borough Council has been embarrassed to include a fulsome account of its urban conservation intentions in the Local Plan 2019, but this is not supported by hard facts. It is difficult to trust that WBC is suddenly urban conservation friendly.

As it stands, Warrington Borough Council's Urban Conservation Strategy and intended policies in the Local Plan 2019 is **un-sound and undeliverable**, (WBC has grandiose ideas to become a city which implies comprehensive demolition to accommodate high property speculation aka demolition of the historic environment).

Endnote:

This objection letter has been delivered in three versions:

- 1) By registered post:
- 2) By e-mail as an attachment
- 3) By e-form