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Warrington Local Plan Examination in Public	
Representor/Number	Stockton Heath Parish Council 0383
Document Title	Hearing Statement – Matter 6b
Version/Date	V1 22 July 2022
GTP ref	2205005
Site	South East Warrington Urban Extension

1 Introduction

1.1 Groves Town Planning has been appointed by Stockton Heath Parish Council (SHPC) to support representations made to the Examination in Public to the Warrington Local Plan.

1.2 The Parish Council has consistently raised objection in their representations to the various iterations of the plan as it has progressed to the current stage. Concern has focused on the impact of the loss of Green Belt and the direct impact of traffic which will use the main arterial routes passing through Stockton Heath, given the lack of infrastructure of a scale and form sufficient to deal with the impact of large scale housing and commercial development.

1.3 SHPC has had long term concerns over air quality in the village centre and the main routes which pass through it. This has in the past reflected concern with stationary traffic waiting for swing bridges to close as ships pass down the Ship Canal and concerns of nitrogen dioxide and carbon monoxide emissions. Whilst such concerns have not been entirely resolved, more recent focus has related to issues with particulates reflecting international and national concerns over the health impacts of air borne particulates produced particularly by road based transport.

1.4 The Council is aware of copious representation and comment from elected bodies, interest groups and individual residents across South Warrington. The concerns raised over the impact are reflective of the Council's position and for the sake of brevity are not repeated here.

1.5 The Parish Council has also noted commentary on the manner in which the need for such high levels of growth and development are justified. There is consensus with others that the scale and form of development now proposed is unfounded and unnecessary, but again would seek to use this representation to focus on the direct, adverse impacts of development on Stockton Heath.

2 Infrastructure

2.1 Warrington is unique. Whilst settlements were initially focused on a crossing point of the Mersey in Latchford, the later industrial town developed on the northern side of the River. Development on the south of the side of the Mersey increased as the 18th Century Bridgewater Canal and the late 19th Century Manchester Ship Canal partitioned the area. Crossings reflective of demand at the time and using

contemporary technology were placed across the two canals. This leaves a legacy of humped backed bridges and underpasses across the Bridgewater; three swing bridges and a fixed high level bridge across the MSC. The Manchester Ship Canal Company (Peel Holdings) has absolute and legal control over the Ship Canal bridges. The position established in 1890 remains unaltered.

2.2 This situation has been influential in the scale and form of development which has taken place in South Warrington. The New Town could not deliver the necessary infrastructure in order for development in South Warrington to evolve in the same way as North Warrington.

2.3 The Submission Draft ignores the lack of connectivity between the two parts of the town and its centre. It continues to depend on Victorian structures and to assume that the

swing bridges will never swing or require maintenance. Experience demonstrates how a hot summer will bring the challenges of expansion of structures and the inability to close a bridge once opened. The population of South Warrington is consequently tempted to look elsewhere to work, shop and spend leisure time. (Taxi firms specifically caution customers on their inability to guarantee transport to Warrington's town centre stations to meet specifically timed train when travelling from South of the Ship Canal).

2.4 The scale and form of the development proposed in South Warrington is acknowledged as resulting in increased trips by all transport modes. [Submission Draft 7.2.1] There is clear acceptance of additional pressures on a failing network including highway infrastructure. Stockton Heath sits at a key node on the local transport network where the A49, the main

north south route across Warrington with the A50/56 which links with key junctions on the M6 and the M56

2.5 . The Infrastructure Delivery Plan - IDP notes that all of the main development areas require extensive infrastructure to support their development. The Council has identified the strategic infrastructure requirements of these allocations - over and above standard on-site infrastructure and S106 planning obligations - and included these in the Viability Assessment as a per dwelling cost.

2.6 It is noted in PSV21 that at a broad Borough-wide level Warrington can accommodate the levels of development proposed by the Proposed Submission Version Local Plan (2021) as long as a comprehensive approach is taken to the provision of infrastructure, particularly on the larger development sites. The Parish Council would challenge this assumption on the basis that infrastructure proposals cannot

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provide for the impact of new development and resolve existing issues.

2.7 The PSV perpetuates 40 years of development with no regard to changing circumstances.

2.8 The IDP notes that in order to co-ordinate this approach the Council aims:

- To encourage investment in and improvement of existing infrastructure.
- To work in partnership with internal and external stakeholders to ensure the timely and co-ordinated provision of high quality infrastructure that supports future growth.
- To continue to assess the infrastructure needs and requirements which will support growth in the Borough through the IDP.
- To monitor and review the IDP on a regular basis to ensure that future infrastructure needs are considered and updated

2.9 11.13 It is the contention of the SHPC that even the start of development of the scale proposed, particularly in South Warrington, without an absolute and clear commitment to the funding and the delivery of infrastructure would be disastrous, compounding existing problems of congestion, air quality, and showing a lack of consideration of climate change.

2.10 Appraisal of the IDP concludes that indicative costings and methods of delivery it is considered that there is considerable risk that new development will take place without capacity to deliver essential infrastructure.

2.11 There is no reference in the ARUP appraisal to issues arising from the opening of the swing bridges across the Manchester Ship Canal and possible consequences of increased traffic to serve development in Salford via the Canal.

2.12 The proposed transport infrastructure improvements appear to ensure strong and robust connections via upgraded

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highways onto the A49 and A50 and onto the M56 and M6.

There is no indication as to how issues with existing barriers and areas prone to congestion on routes heading north into the town centre will be managed. There are no improvements proposed to the junction of the A49 and the A56 through Stockton Heath. There are no indications of improvements to the junction of the A56 with Lumbrook Road – or connection with a proposed second high level crossing.

2.13 There are no indications as to how additional traffic flows produced by the development can be accommodated through the already heavily congested Latchford one way system routing the A50 via its junction with the B5156 Station Road and the A5061 into the town centre.

2.14 In combination these arrangements would appear to make it easier to leave Warrington to the south onto the motorway network and discouraging of journeys to the north into the

town centre. This appears to directly contradict policy objective W3 - To strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub, whilst transforming the quality of the public realm and making the Town Centre a place where people want to live.

2.15 The Plan and evidence base demonstrate little apparent knowledge or awareness of the extent of proposed use of the Ship Canal. The nature of the development of the Canal means that the operator has a legal right to move vessels through the crossings. The Council has no legal means of control over the timing and frequency of bridge openings.

2.16 The Submission Draft considers that development will meet the twin aims of accessibility and sustainability (in transportation terms). Development in South Warrington will not achieve either. The SEWUE is isolated from key facilities

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and likely sources of employment. There are no improvements to key linkages to the town centre which might even loosely be considered to support regeneration objectives.

2.17 . Development proposals would load additional traffic onto parts of the highway network where Air Quality is an issue and routes already designated as AQMAs. 11.35 The Submission Draft notes that it will be a requirement that trips generated by development can be adequately accommodated by Warrington's transport network. Clearly this is the correct approach but the policy makes no attempt to define "adequate".

2.18 Congestion and delays at key points in the network – including Stockton Heath, already provides demonstration of the need for major improvements to infrastructure provision prior to any additional development taking place. Town Centre congestion is presented as a reason for business to

look to business park and out of centre locations. The solution to this is not localised improvement, but improvements which address wider impacts comprehensively, across the whole network, including the provision of a deliverable and workable new crossing of the Manchester Ship Canal.

2.19 The Submission Draft refers to only one additional crossing of the Manchester Ship Canal and two crossings of the Mersey (including the now constructed Chester Road Crossing to serve Centre Park) and no additional crossings of the Bridgewater Canal.

2.20 The largest single allocation of the Submission Draft – the SEWUE - would be linked to the existing highway network by three already congested main roads. The A49, the A56 and the A50. Principal points of access to these routes would rely on narrow bridges and a single carriage tunnel to cross the Bridgewater Canal, each constructed in the 18th Century

2.21 Submissions relating to the SEWUE illustrate the concept of a link road from the A50 close to junction 20 of the M6 to the A49 close to junction 10 of the M56. The PSV describes the route as a new strategic link connecting the allocation site with the A49 and easing congestion at the Cat & Lion junction. Additional connections will be made to the A49 at Lyons Lane and Longwood Road junctions as well as a link to the A50 to the east, via a new connection to Grappenhall Lane. 11.51 The rationale and justification for the precise layout of this route is unclear from the submitted evidence base.

2.22 This arrangement simplistically accepts that traffic seeking access to the town centre or routes around the centre will use the existing A49 though Stockton heath.

3 Air quality

3.1 There are a number of existing air quality management areas in Warrington. These are based around the motorway corridors of the M6, M56 and the M62 and the A49 as it enters the town centre.

3.2 The proposals contained within the development plan increase the risk of issues for air quality.

3.3 The Air Quality Management Study produced to support the PSV2019 has not been updated. A consultation version of an Air Quality Action Plan was produced in February 2021 but has not as yet been adopted.

3.4 DEFRA figures are quoted in WBC Air Quality Annual Status Report 2020 dated June 2020. This report notes improvement in levels of NO₂ Nitrogen Dioxide levels but an increase in levels of particulate matter PM 2.5 and PM 10 the source of pollution is recognised as road transport.

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The report notes that growth plans for the Borough emphasise the need for long term action plans.

3.5 As it stands those plans are not an apparent element of a PSV totally focused on road base transport.

3.6 The 2019 AQMS notes that traffic levels predicted in the plan are based on the Multi-modal Transport Model, the veracity of which is questioned above. If, as suspected, the model anticipates traffic flows which assume no closure of the Ship Canal swing bridges, it follows that the assessment of impact of development on air quality is similarly flawed.

3.7 There is no clarity as to how the seismic modal shift in transportation will transit from road based travel to work and freight movement. Employment allocations rely heavily on the logistics sector and road based transport onto an already highly congested network. Initial

infrastructure improvements will be focused on highway development. Public transport infrastructure is only planned for the end of the plan period or beyond.

3.8 The Air Quality Management Study assumes that increases in traffic, which is currently the main source of air pollution, will be balanced by technological changes which will remove road vehicles as a source of NO² and harmful particulates by 2040. This is of course outside the Plan period and it seems likely that significant parts of the development would take place before changes in technology come into effect.

3.9 The study fails to take account of the significance of many of these routes as public thoroughfares and shopping streets – London Road, Stockton Heath, for example. The study does not take into account increases in pedestrian and cycle routes, a key element of the modal shift away

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from car transport and therefore, the increasing number of people exposed to traffic pollution.

3.10 The WHO Ambient Air Quality Database v11 – 29 May 2018 identifies towns and cities exceeding the recommended WHO limit of $10\mu\text{g}/\text{m}^3$ for PM_{2.5}. At $14\mu\text{g}/\text{m}^3$ Warrington is considered to have one of the highest levels for this type of particulate in the UK. The WBC Air Quality Action Plan notes strong evidence of PM_{2.5} but has only one monitoring site, on Selby Street adjacent to the A57 on the western side of the town centre, to measure levels, and notes that there have been no assessments of any hot spots where concentration could result in raised levels. Review of available data from the Selby Street monitor suggests levels of between 30 and $85\mu\text{g}/\text{m}^3$, levels which are considered dangerous by the WHO.

3.11 Monitoring equipment has been installed on London road Stockton Heath by the Parish Council. Even with the considerable reduction in traffic across the period of the pandemic, over the monitoring period the daily average for PM_{2.5} was measured at $8.47\mu\text{g}/\text{m}^3$ against a current WHO recommended maximum of $10\mu\text{g}/\text{m}^3$.

3.12 In response to consultation on appropriate levels Warrington BC has suggested this level should be $5\mu\text{g}/\text{m}^3$

3.13 DfT figures [Provisional Road Traffic Estimates – Great Britain July 2020- June 2021 all motor traffic decreased by 5.5% across that period with car and lorry traffic reduced by more than 8% compared with the year ending June 2020.

3.14 The Plan depends on the additional transport demands it creates being accommodated through modal shift or their impact lessened through technological

change reducing vehicle emissions. At best this might be achieved at the end of, or after the plan period in the late 2030's or 2040's. The scale of development will, in the medium to long term, perpetuate issues of pollution levels across Warrington at a level acknowledged as damaging to health.

3.15 The scale of development proposed in the SEWUE and the South East Warrington Employment Area would seem to undermine this objective, exposing residents and visitors to Stockton Heath to higher levels of NO₂ and PM2.5 with consequent issues for morbidity and premature mortality.

4 Conclusions

4.1 Stockton Heath Parish Council is concerned that the submission of the plan is fundamental flawed in terms of

the way in which considers the impact of large scale development in south Warrington on the residents and businesses it represents.

4.2 In particular the plan fails to properly address the scale and form of infrastructure required to serve the developments. As such traffic generated will use new roads with the development areas and deposit that traffic on an already congested network.

4.3 The network is complex and restricted by the need to cross the River Mersey, the Manchester Ship Canal and the Bridgewater Canal. The development proposals rely on a highway network which depends of infrastructure from the Victorian era.

4.4 Critically a key focal point for this traffic, particularly traffic accessing the town centre is the A49.

4.5 A critical impact of increase traffic levels and congestion is reduction in air quality. It is demonstrated that concern over air borne particulate supported by measures which show that expected targets are already exceeded with development only exacerbating levels and potential health impacts.