



# Groves Town

## Planning LTD

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Warrington Local Plan Examination in Public	
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### 1 Introduction

1.1 Groves Town Planning has been engaged to represent the South Warrington Parish Council's Local Plan Working Group (SWP) since April 2018 at which time the Preferred Development Option of the Council had been published.

### 2 Key Areas of Concern

Need

Green Belt

Infrastructure

### 3 Need

3.1 Concerns over the way in which the employment and housing needs have been assessed and extrapolated into the Plan are covered in responses to other matters

identified by the Inspectors and are not repeated here.

See comment on matters 3, 4 and 5 within hearing statements produced for SWP.

### 4 Green Belt

4.1 Paragraph 140 of the NPPF notes "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they endure beyond the plan period. Where a need for changes to the Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies including neighbourhood plans".

4.2 The proposed scale of Green Belt release to accommodate the SWUE creates a number of tensions with the function and purpose of the Green Belt.

4.3 Detail assessment of the impact of development on the purposes and function of the Green Belt will be assessed as policy relating to site allocations is considered in a later section of this document. In general terms it is considered that the assessment of the current contribution of designated Green Belt in South Warrington is understated in the Arup assessment and therefore within PSV21.

4.4 The importance of the Green Belt in the Walton area is recognised in terms of the risk of merger with Moore and developed areas Runcorn within Halton. It is noted that Halton BC raised objection to the 2017 PDO on this basis.

4.5 The selective assessment of which historic areas should be considered in the context of Green Belt purpose is

apparent in the case of Grappenhall and Thelwall and Walton. The assessment ignores the setting of some of the most historic parts of the Borough which would be significantly altered as a result of encroachment of development and a change to the semi-rural setting of Grappenhall.

4.6 The assessment ignores the impact of the Bridgewater Canal corridor as a sound and logical boundary to the urban area on the south side of Warrington. The release of the land to the south of the Canal would represent encroachment into the open countryside and the merger of pockets of development with long established, historic settlements.

4.7 Previous local plans and the submission draft all make reference to the key characteristic of Warrington as an urban core, with distinct settlements surrounding the town

and set in attractive rural surroundings. The release of land undermines this principle to the considerable detriment to the character and appearance of the area.

4.8 No account is taken of the importance of the topography of the area proposed to be occupied by the SEWUE. The land steadily slopes downwards to the north by 50m. This has two critical impacts. Views from the Bridgewater Canal look south up the slope with tree lines and existing development at Grappenhall Heys providing ample illustration of the impact of a developed area occupying this space. This would affect the openness of the Green Belt when viewed from Knutsford Road, Australia Lane, Broad Lane and Lumb Brook Road in particular. Secondly, views south to the Parish Church and the historic core of Warrington from Wrights Green, Broad Lane and Knutsford Road would be altered. The setting of the

historic cores of Walton and of Grappenhall Village would be changed to the considerable detriment of the locality. The Green Belt function of protecting the setting of historic settlements is eroded.

4.9 It is contended that the severe and significant harm noted in that case provides a measure against which the impact of the much larger change to Green Belt now proposed should be measured.

4.10 There is no clear approach to the necessary compensatory improvements required by NPPF Para 142

## 5 Infrastructure

5.1 Warrington is unique. Whilst settlements were initially focused on a crossing point of the Mersey in Latchford, the

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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.

5.2 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.

5.3 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.

5.4 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.

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5.5 The adoption of the LTP4 anticipated a different set of allocations and development proposals to the development schemes now proposed.

5.6 The PSV19 and related evidence base, the emerging Local Transport Plan (LTP4) paint a picture of the existing highway network across Warrington. The evidence base has now shifted to the Infrastructure Delivery Plan 2021.

5.7 The 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.

5.8 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. This representation would challenge this assumption on the basis that infrastructure proposals cannot provide for the impact of new development and resolve existing issues.

5.9 11.11 The PSV perpetuates 40 years of development with no regard to changing circumstances.

5.10 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

5.11 It is the contention of the SWP 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.

5.12 The IDP is fundamentally flawed in three ways.

5.13 Firstly, the massive cost of delivering development on strategic sites is based on developer derived funding based on the delivery of development beyond the plan period. For the SEWUE funding of infrastructure is based on the delivery 4200, suggesting either an expectation that more than the 2400 dwellings proposed will be built within the plan period or alternatively that infrastructure will not funded/delivered until the end of the plan period or beyond. This is fundamentally inconsistent with the effective criterion of soundness which requires a Plan to be deliverable over the Plan Period.

5.14 Secondly, given recognition that existing infrastructure fails to meet current requirements, new development must be supported by investment in strategic infrastructure at commencement of the development process rather than on completion.

5.15 Thirdly, the detailed schedules relating to the cost and delivery of infrastructure is inconsistent the delivery schedule identified as necessity within LTP4.

5.16 There is no indication in the schedule attached to the IDP as to how and when additional crossings to the Bridgewater Canal and the Manchester Ship Canal can be delivered. References to mass transit systems specifically noted in LTP4, are not covered in any detail in the IDP.

5.17 Whilst the original SWP representation reflects concern over all aspects of infrastructure provision, it is considered most pertinent to draw attention to the inadequacy of proposed highway infrastructure

5.18 The AECOM assessment notes that additional interventions are still required over the plan period as a result of existing network conditions or the impact of development. The report also notes that requirements are

determined by a model based on 2400 dwellings in the SEWUE.

5.19 This conclusion seems to contradict the IDP which requires development beyond the plan period to fund the infrastructure requirements of development. 11.22 There would appear to be a number of inconsistencies between the AECOM assessment; LTP4 and the IDP.

5.20 LTP4 was presented as aspiring to deliver a mass transit system by the end of the plan period as part of the expectation of ensuring that new developments would be served by sustainable non car based transport modes, with a transformational modal shift away from car use.

5.21 The 2021 PSV includes provisions for and safeguarding of a route to cross the Ship Canal. This is not referenced as being deliverable during the plan period in the IDP. The PSV refers to a new crossing of the



Bridgewater Canal which is not addressed in any part of the submitted evidence base.

5.22 11.23 The AECOM appraisal concludes that additional development can only be accommodated with the implementation of the full package of transport improvements presented in scenario 2 – including the Western Link Road.

5.23 Given appraisal of the IDP, 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.

5.24 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.

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

5.26 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.

5.27 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.

5.28 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.

5.29 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". It is clear that the existing trip base is not adequately served. Traffic flows at key points on the network are severely constrained.

5.30 Congestion and delays at these points today, 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.

5.31 None of the background papers submitted with the PSV 2021 provide indication of the viability of the Western Link particularly in the changed circumstances of the development to which it was previously inextricably linked. Submissions made with the latest PSV imply modification to previous schemes with little or no reference to impact on cost, viability of deliverability.

5.32 The River Mersey is crossed at 6 points within the Borough although two provide general routes

5.33 The Manchester Ship Canal is crossed at 5 points, although Moore Swing Bridge provides access to a limited area. With the exception of the Thelwall Viaduct, all of the Ship Canal crossings in Warrington are the original Victorian structures which although skilfully and robustly constructed, are well into their second century of operation.

5.34 The Bridgewater Canal is crossed by main roads 5 locations. The Canal is also crossed at various points through routes using original 18th century canal infrastructure.

5.35 Proposals to develop land for 4200 houses and to allocate 116ha of land for employment purposes show limited realistic appraisal of the ability of the existing highway network to accommodate this scale of development.

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5.36 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.

5.37 The proposed Western Link is poorly located, being too far west to merit use by the majority of South Warrington based residents or businesses.

5.38 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.

5.39 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. This is particularly the case with connection with the A49 at Stretton.

5.40 Submissions made with the PSV evidence base make it difficult to distinguish costed projects in the IDP which make up this route and to assess its total cost.

5.41 The PSV notes that the new link road will also contribute to wider transport mitigation measures to offset the impact on Junctions 10 of the M56 and Junction 20 of the M6, in agreement with Highways England. There is no clear explanation of what is meant by this statement or how this off set of impact will be secured.

5.42 The PSV also notes that delivery of a scheme to relieve congestion at the existing Cat & Lion junction of the A49 is essential to enable to development. Within the plethora of data submitted with the PSV it is difficult to fully understand how this junction works and how it is justified.

5.43 It is ultimately the case that whilst alteration to junctions on the A49 may enable new development to be accommodated without overloading of those specific junctions – the proposals do not alter the fact that all of

new development proposed in south Warrington would have to utilise the existing highway network with all the constraints caused by limited crossings of the 3 waterways.

5.44 The only reference to any solution to this issue is the protection of a route for a high level bridge over the Manchester Ship Canal- a project which is not presented as a complete proposal, has no full costing or programme. The scheme would have major impact on Latchford and the wards of Latchford East and Fairfield and Howley, with traffic from any new crossing deposited onto the already congested local highway network.