Groves Town

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Warrington Local Plan Examination in Public	
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1 Introduction

- 1.1 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.
- 1.2 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 SWP would challenge this

assumption on the basis that infrastructure proposals cannot provide for the impact of new development and resolve existing issues.

- 1.3 The PSV perpetuates 40 years of development with no regard to changing circumstances.
- 1.4 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.
- 1.5 The IDP is fundamentally flawed in three ways. 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.

- 1.6 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.
- 1.7 Thirdly, the detailed schedules relating to the cost and delivery of infrastructure is inconsistent the delivery schedule identified as necessity within LTP4. 11.18 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.

- 2 Transport Infrastructure Road
 - 2.1 Modelling of the transport infrastructure by AECOM
 [Transport Model Testing of the WBC Local Plan 31
 August 2021] provides three scenarios reflecting
 development proposals and infrastructure provision.
 - Scenario 1 This scenario considers all the developments (land use changes) outlined in Chapter 3 but with only committed highway infrastructure included.
 - Scenario 2 As Scenario 1 plus a number of additional highway infrastructure schemes that are required to enable the proposed growth to occur in a number of locations.

- The additional schemes include the proposed Western Link Road.
- Scenario 3 As Scenario 2 plus 2 policy interventions identified in the approved LTP4 but not yet committed.
- 2.2 At 5.17 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.
- 2.3 This conclusion seems to contradict the IDP which requires development beyond the plan period to fund the infrastructure requirements of development.
- 2.4 There would appear to be a number of inconsistencies between the AECOM assessment; LTP4 and the IDP. 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. 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.

- 2.5 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.
- 2.6 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.

- 2.7 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.
- 2.8 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.
- 2.9 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.

- 2.10 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. 1
- 2.11 The Plan and evidence base demonstrate little apparent knowledge or awareness of the extent of proposed use of the Ship Canal. The Local Highway Authority has presented the proposed Western Link as an alternative route into the town

centre or for traffic to reach Omega and employment areas west of the town. Should this be the case the Link would draw traffic through Stockton Heath and Walton from the proposed new developments.

- 2.12 The Western Link would also provide access to residential and employment related uses on the Warrington Waterfront. The main route into this area would be via the proposed Western Link and thence onto the A56 at Walton from where access can be gained to junction 11 of the M56. New streams of commercial traffic would be drawn onto the already congested A56.
- 2.13 It would be appropriate for the evidence base on highway infrastructure to consider the impact of the Centre Park Link Road on the local highway network, congestion now caused at the junction of the new road with the A5060 Chester Road and the junction of the new road with the A5061 Wilson Patten

Street. 11.34 In each case the impact of developments proposed for South Warrington will have a clear, significant and adverse impact on existing communities in the area, including some areas which experience the higher levels of deprivation in the Borough. Development proposals would load additional traffic onto parts of the highway network where Air Quality is an issue and routes already designated as AQMAs.

- 2.14 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. For example-
 - A49 Winwick Road

- A57 Sankey Way
- A49 Stockton Heath
- A49 Wilderspool
- A57 Chester Road
- A50 Grappenhall
- A56 Walton
- A49/A5061 Warrington Town Centre
- A50 Padgate
- 2.15 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.

- 2.16 A major barrier to this approach is the means of funding. The business case for the Western Link demonstrates that it is the development proposed which creates potential funding for infrastructure improvements. In that case prudential borrowing by the Council will ultimately be supported through business rates, New Homes Bonus and CIL/S106. This is not a sustainable approach given uncertainties over costs, uncertainty over the pace of development and the planning process for the delivery of infrastructure.
- 2.17 Changes to the plan have reduced the scale of development previously proposed which would have accessed the Western Link Road. Less development will reduce developer contributions, New Homes Bonus and contribution through planning obligations. Appendix 13 of the Cushman

and Wakefield Report August 2021 Emerging Local Plan Viability Assessment indicates contribution through Section 106 Agreements for off-site transportation works is zero.

- The Western Link Road is a concept which has been in 2.18 gestation for the best part of a decade. Within the 2019 PSV it was presented as a viable proposal to provide a solution to existing levels of congestion, particularly within the town centre. The Link also provided appropriate capacity within the network to serve new development at Port Warrington and Warrington Commercial Park. Yet now it is being suggested that both these developments are excluded from the Plan as the Western Link would not have capacity to serve these and the remaining developments - Warrington Waterfront, without issues at the northern and southern junctions of the Link.
- 2.19 This effectively accepts that the highway justification for the Western Link and related development in PSV 2019 was wrong. This at the very least erodes confidence in the justification for and functionality of the Western Link as currently proposed.
- 2.20 None of the background papers submitted with the PSV2021 provide indication of the viability of the Western Link TheRiver Mersey is crossed at 5 points within the Borough
- 2.21 The Manchester Ship Canal is crossed at 5 points. 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.
- 2.22 The Bridgewater Canal is crossed by 5 main roads.
- 2.23 The Bridgewater Canal is also crossed at 15 points through routes using original 18th century canal infrastructure.

- 2.24 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.
- 2.25 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.
- 2.26 The proposed Western Link is poorly located, being too far west to merit use by the majority of South Warrington based residents or businesses.
- 2.27 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.

- 2.28 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.
- 2.29 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.
- 2.30 There are major concerns over the acceptability and impact of this new route.
- 2.31 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.

- 2.32 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 no clear explanation of what is meant by this statement or how this off set of impact will be secured.
- 2.33 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.
- 2.34 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.

- 2.35 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.
- 2.36 The failure of proposed highway interventions to deal with the impact of new development and to remedy existing issues on the highway network in south Warrington, is completely at odds with objectives of the plan to increased accessibility to the town centre and to ensure that it provides a viable focus for commercial, retail and leisure activity for the Borough.

- 3 Transport Infrastructure Rail
 - 3.1 The Plan aspires to encourage and support the use of multi-modal freight transport facilities. The majority of employment allocations in the plan relate to logistics based developments. Currently no logistics site in the Borough has rail access and all rely entirely on road freight.
- 3.2 It is worthy of note that the Council has objected to the rail connected Parkside Distribution Centre in St Helen's on the basis of impact on the Green Belt and the local highway network.
- 3.3 The Submission Draft is positive towards the provision of rail infrastructure and services and the provision of rail facilities. This is somewhat ironic as the Council has consistently raised issue over HS2. The Council has missed opportunities to make Warrington the hub of HS2 connections with Manchester and

Liverpool and Transpennine routes and raised issues with the Golborne.

3.4 It is curious as to why allocations for major development are located at the furthest points from rail connectivity. The return on investment in a new Warrington West railway station would be optimised with further development which would have easy access to the Groves Town Planning Ltd Page 86 Manchester – Liverpool Cheshire Lines route, in North West Warrington. No consideration is given to the potential to increase the use of Padgate, Birchwood and Glazebrook Stations through related development in closure proximity to these points of access to the rail network. The Rainhill route from Liverpool to Manchester provides access to North Warrington via Earlestown and Newton le Willows which is largely ignored in the Plan. Sections of this route lie within the

- Borough and could support new development through easy access to the rail network.
- 3.5 Much has been made of the high level of rail connectivity into Warrington in PSV 21, links to HS2 and the prospect of a Warrington stop on the Northern Powerhouse rail route between Liverpool and Manchester (HS3). The potential for such a link is included in justification for the high levels of growth predicted. There is no certainty that the link would be delivered within the plan period. Routing is unknown except possibly for that part of HS2 from Manchester Piccadilly to the Manchester Airport. This would suggest a route passing to the south of Warrington before crossing the Mersey and extending west into Liverpool. It has been suggested that this route connects into the West Coast Main Line at Warrington Bank Quay Low Level This line would have to cross parts of the

South Warrington Green Belt and the Warrington Waterfront compromising current proposals and allocations.

- 3.6 Northern Powerhouse Rail documentation suggests that a link to Warrington might consist of a Warrington South Parkway Station presumably south of Walton Goods Yard sidings where it would provide for interchange with the WCML and the Chester and North Wales routes and also serve Daresbury Science Park. This would all take place in areas of Green Belt already under pressure through the allocations of the Submission Draft.
- 3.7 The Plan relies on transformational infrastructure provision including the development of mass transit systems and a shift away from the private car. With the exception of the protection of disused rail corridors in policy INF1, there is no consideration as to how the route from Arpley Meadows to Fiddlers Ferry and onwards to Widnes and Ditton route might

provide a tangible and sustainable route for the occupiers of new development in West Warrington into the town centre.

- 3.8 The Plan fails to show any clear understanding of the complex interrelationships between development and infrastructure and misses the opportunity to properly plan for the implications of such development. The envisaged infrastructure, even if it were deliverable, only comes into place in the years following the end of the Plan period.
- 3.9 The approach reaffirms concern that the Plan is an exercise in urban design rather than a holistically prepared plan which is sound when tested against the requirements of the Framework.
- 4 Community and Health Infrastructure

- 4.1 The Plan alludes to the provision of community and health infrastructure as key elements to sites allocated for development, but provides little or no substance as to the means by which such facilities will be delivered and then how ongoing viability will be secured.
- 4.2 The Plan suggests that it will deal with provision for Gypsy and Traveller sites as well as waste recycling facilities.