



Dear Sirs,

I have read with interest the Council's documents laying out their logic for supporting the development of SE Warrington as a new Garden City and have several comments and observations to make. I believe these would indicate that the Council should reconsider their preference for Option 1 & very seriously look again at Option 4, for a smaller development in the SE with additional developments in the SW & W of the town.

However, before my detailed comments, I also wish to express extreme disappointment at the manner in which the Borough Council has handled the Local Plan consultation with the residents who would be most impacted by the proposals. When one considers that I have received 8 posted notifications concerning the relaying of the pavements & cobbles along Church Lane in Grappenhall Village, (for which I am grateful), I have not received a single letter from the Council on a scheme that is immensely greater in consequence and impact on the local environment of the Village conservation area. Such apparent reticence to proactively engage with the public will inevitably create bad feeling.

#### PROPOSED EMPLOYMENT MEASURES

I found the full set of documents to be surprisingly 'silent' on details of the types and quality of employment it is aimed to generate and on assumptions concerning how these numbers would develop across the 4 phases of the outlined programme. To meet Central Government aims of increasing the productivity of the Regions, to better approach the productivity levels of the London region, would require a very high percentage of the jobs to be created to fall within the professional services, scientific research, engineering and high-end manufacturing jobs. In the case of the proposed Barleycastle employment zone expansion, centred on the M6/M56 inter-section, the existing companies in that area are categorized by lower-productivity warehousing, logistics, transport and lower-value-added manufacturing activities. Unless very positive action has already been taken to change this mix, new businesses arriving are likely to be "more of the same". However, there are existing zones either immediately adjacent to, or within the Borough, where such higher productivity jobs are already clustered and which will act as 'magnets' to draw in more of the same, and on a shorter time-span. These are predominantly in the south-west (Daresbury Park, Sci-Tech Daresbury, Manor Park each in Halton B.C.) and in the NE of the Borough (around Birchwood). Building on these existing 'magnets', would seem to be a much more logical option since seeking to re-create new 'higher-end job magnets' will require longer lead-times from inception until they acquire their critical mass and, in turn, serve as 'magnets' to attract other, similar employment of the same profile. Starting from 'scratch' to create such a high-value add cluster would probably take longer than the 20 year timeframe of the Plan itself. I note in the SHLLA document that the 3 Mid-Mersey Councils have agreed to continue to develop their respective Local Plans to give a coherent growth point legacy, so working across borough boundaries in this manner should not be an issue. It would, however, have ramifications for where new housing should be targeted to be sited within the

Borough and on the travel facilities required to then link the houses with these existing employment 'magnets' to the south-west and the north-east. If the majority of new dwellings are still then located in the SE area, then huge commuting difficulties would be compounded; these are covered later in this letter.

The displayed sequence of developing the new proposed employment zone across the 4 phases of the Local Plan shows employment site development running only slightly ahead of the rate of new residential building. This suggests that no long-term job creation plan is currently in place or already embarked upon. If so, this would be a huge over-sight.

A consequence of the above would be little alleviation of the heavy daily commuting traffic, not only into Warrington Centre, but across the outskirts in both the East-West and North-South directions, and along the main motorways towards Manchester & Merseyside, all of which are already chronically overloaded. The only difference would be the addition of many more thousands of private vehicles on these already congested roads.

### INFRASTRUCTURE DEVELOPMENT

South East Warrington suffers from 5 distinct chronic traffic 'pinch-points', which are already at saturation during peak travel times. These are associated with the swing bridges across the Manchester Ship Canal and the adjacent narrow bridges/ underpass for the Bridgewater canal. The swing-bridge issues will become factors fold worse as Peel Holdings increases its number of local ports, and the level of ships serving them. On top of these, there is the adjacent acute problem of the Thelwall Viaduct to contend with, which seems to be an increasingly frequent issue as the traffic density it carries passes peak-time saturation. This frequently leads to traffic backing up from Latchford right up to the roundabout at the M6 itself, causing Broad Lane and Bellhouse Lane/ Church Lane in Grappenhall being used as a 'rat-runs' by frustrated drivers desperately seeking to find ways around the bottleneck. The added frustration only leads to irresponsible driving standards, posing a very high accident risk, especially along Church Lane.

With the possible exception of the proposed new 'elevated' access road following the former railway line from Thelwall, through Latchford, there is nothing in the plan proposed to alleviate these 5 pinch-points. The proposed new service roads/ priority link roads within the Garden City footprint itself, would only serve to deliver more vehicles, more quickly to these existing 'pinch-points', exacerbating the problems local to each. Local solutions must be included to de-bottleneck these 5 locations:-

- (i) Stockton Heath village is both a major N-S bottleneck (from the Bridgewater canal bridge through to Gainsborough Road) and an E-W bottleneck (through the lights at London Road). A very significant aspect is the 5 sets of lights along a ¼ mile stretch through the village centre, with phasing now disproportionately favouring pedestrians even at peak travel times, when the number of pedestrians isn't yet high;
- (ii) Lumb Brook Road & canal underpass, with associated lights on the A56;
- (iii) Cantilever Bridge and associated "discharge" points on Ackers Road & the A50 respectively. By way of illustration, the recent closure of the high level bridge for re-surfacing work caused the whole area to grid-lock for more than an hour each evening;
- (iv) Traffic lights at Stanney Lunt bridge, where traffic densities from the 'upgraded' Broad Lane can be expected to 'sky-rocket' after housing & employment developments have taken place, and where traffic from Stockton Heath is very frequently 'blocked' as traffic seeks to turn right at the lights;
- (v) The A49 swing bridge & one-way system at Latchford, which MAY be impacted by the proposed new access road, though even the plan concedes that more detailed work is required to better understand the traffic impacts of such a mega-number of new dwellings into a single area.

Whilst the proposed high-level new roadway across the Ship Canal would be an innovative concept, it would have major issues. Firstly, it would be of limited width only, particularly for public transport/ HGV usage. Secondly, being at roof-top height, it would bring exacerbated noise and emission particulates issues, depositing these onto the dwellings & thoroughfares below. It is inconceivable therefore that the Council should seek to make any decision on the preferred development option without first having a very clear & evidence based understanding of all the

additional traffic requirements. Any decision on the plan must be shelved pending the completion of these studies. Simply living with the consequences of poorly understood requirements should not be acceptable.

#### ASSESSMENT CRITERIA FOR OPTION SELECTION

In the absence of numerically scored assessments, to show the weighting importance of each criterion, much of the analysis in the plans appears to be highly subjective. The most glaring instance of this is the use of ‘Contribution to New City Concept’ as one of the assessment criteria – this is highly circular logic! One cannot seek to use the level of contribution from a particular criterion to assess the worth of that criterion – it simply isn’t scientific or logical.

Green-belt implication assessments appear to be similarly highly subjectively rated. The proposed garden city area is rated as ‘moderate’ or ‘poor’, but with no precise logic attaching to these. Yet, at a local level, areas are mentioned within the same area which contribute a ‘strong’ green belt impact, but with no expansion or explanation given as to why the ‘moderate’ & ‘poor’ assessments should outscore the ‘strong’ aspect. Most weight appears to have been given to 2 aspects – whether there is a significant urban neighbour separated by the green-belt in question or whether there is a further ‘robust’ green-belt boundary beyond the area being considered (such as a motorway), in which case the green-belt impact is assumed to be poor. This simply doesn’t make sense. Both of these criteria appear to reflect some commonly accepted interpretation as practiced by the planning fraternity rather than a logic based assessment – for example, putting either residential or employment areas right up to a motor-way boundary appears to take no consideration of the chronic impact of particulate emissions/ deposits on the land adjacent to those thoroughfares. Keeping such emission-prone zones well away from work or dwelling places is a much more logical aspect of assessment, as would be the provision of a ‘green lung’ as near as possible to the centre of the town. When considering expansion of housing in the north of the borough, the proximity of the M6/M62 motorways was seen as a reason not to favour development. Yet the proximity of the M6/M56 motorways in the SE isn’t seen in a similar light. Here (in contrast), the motorway seems to be seen as a natural, sustainable barrier that will prevent future sacrifice of the green belt. No consideration appears to have been given to the health blight of people working in the proposed abutting employment zone from heavy particulate emissions from those motorways. Where is the consistency of logic? A ‘cordon sanitaire’ of some 50 metres (minimum) between M-way boundaries & buildings should be the norm.

#### SUPPORTING ROLE OF THE TOWN CENTRE

The supporting role of the town centre (both in terms of potential employment and infrastructure support) appears also to have been highly over-assessed, simply because of a perceived (but flawed) geographic proximity aspect. As someone who has to commute daily from Grappenhall, across Warrington, to get to St Helens the journey is usually a nightmare at peak travel times, with Bridgefoot being a ‘no-go’ zone from 8:00am until after 9:00am because of the slow-moving traffic queues through Latchford and past Victoria Park. Only 4 or 5 vehicles per light change usually get through onto the Bridgefoot roundabout. Yet it is highly likely that an extra 2,000-4,000 cars a day could conceivably be seeking to commute towards or into the town centre through the 5 identified ‘pinch points’ and/or the Thelwall Viaduct, along these same (already congested) roadways. Based on existing travel patterns, many residents in the SE simply find it very much easier (& perhaps more agreeable?) to journey AWAY from the Town Centre to shop and this pattern is likely to persist after the proposed expansion unless traffic issues are fully sorted out.

#### (VIRTUALLY) ALL “EGGS IN ONE BASKET”

The report acknowledges that the SE quadrant has already seen major new building programmes which have impacted (especially) the characters of Appleton Thorn, Grappenhall Heys and Grappenhall Village. The Plan also acknowledges that the new proposals would have further major impacts on the characters of all 3. Nothing appears to have been ‘scored’ into the preferred option selection to account for these. The acknowledgements just appear thereafter to be ignored from the option preference assessment scoring.

The Plan similarly identifies the very high delivery risk of putting virtually all the eggs into one basket by locating the vast majority of expansion into a single zone, whilst acknowledging that delivery still has “significant infrastructure impacts to understand, requiring more detailed studies”. The whole thesis of going for Option 1 would

appear a very high risk strategy. Based on the data & assessments included in the plan and supporting documents, along with my additional comments concerning the types of jobs that ought to be created (& the already existing centres for these to the SW and NE of Warrington), I believe that equally strong cases have been made for selecting Options 4 and 5, as have been made for selecting Option 1.

The suspicion remains that the manner of presenting, and even the numbering of the options themselves, shows a strong predilection for Option 1. This suspicion has been further reinforced by the amazingly poor consultation process followed by the Council.

#### VALUE OF ASSUMPTIONS USED IN THE SHLAA?

As a location I know extremely well, I saw with alarm the conclusion in the SHLAA that 20 new dwellings could be located onto the net capacity of the former Grappenhall Hall residential school. [Strategic Housing & Land Availability Assessment (item -2177)]. The area showing on the accompanying plan corresponded only to the rear part of the total plot and didn't clarify whether this was in addition to the listed school building itself, or whether there was a presumption of demolition of the latter? No additional road access was mentioned in the plan, therefore one must assume access/exit would be via the narrow main drive, exiting onto Church Lane directly opposite St Wilfred's primary school, which would be highly irresponsible given the number of school children at that narrow point, and likely to lead to accidents!! My conclusion was that the 'experts' who compiled the data had conducted a purely desk-bound paper exercise, based purely on land areas & presumed planning densities, but taking no account of the actual local situation and its limitations. If this appears to be the case here, how can one have confidence in their assessments for the land development /housing capacity totals across the whole plan? It doesn't fill me with confidence.

Sincerely,

[Redacted signature]

[Redacted address]