RETHINKING SOUTH WARRINGTON'S FUTURE

Monday 10th June 2019

To whom it may concern,

Transport and air quality submissions to the Local Plan/LTP4 consultations

Dear Sir/Madam,

Please find attached a copy of two detailed reports produced by the Rethinking South Warrington's Future group. RSWF is a group of community organisations, residents associations, NDP committees and interested persons covering much of South Warrington. As part of our engagement with the Local Plan/LTP4 consultation process, RSWF convened two working parties to look at specific elements of the Local Plan and LTP4, namely transport and air quality. The attached reports produced by these groups represent a significant amount of research and expertise by the members of those working groups. Together, they raise a number of serious questions which must be addressed by the Local Plan and LTP4 before they could be deemed as sound and sensible public policy. I would draw specific attention to these twelve key questions for the Local Plan and LTP4:

1. Council traffic planners have confirmed LPT4 as an aspirational 'concept' document which only outlines some options and preferences. Therefore, it lacks important detail for residents to make truly informed judgments. The schemes, or possible schemes , listed in the LPT4 will cost a very significant sum . Given the pressures on overall UK public expenditure, and specific pressures on the Department for Transport, there is little prospect that no more than a very small fraction of Government subsidy will be realised within the timescale of the Local Plan period. Almost all of the LTP4 is an aspirational wish list and no timescales whatsoever are offered regarding delivery. Therefore, the Council should not commit to large scale development in the South of Warrington until they achieve certainty of the necessary transport infrastructure.

2. Air Quality is a major issue in Warrington with the Town identified by the World Health Organisation as being in the top 5 Towns/ Cities in England that exceeds the pollutants limit. It is therefore very likely that the proposed new housing in South Warrington (circa 7000 dwellings) , together with the Six/56 and Stobart's developments will have a deleterious effect

upon air quality and noise , particularly in existing congested locations such as Stockton Heath high street and Latchford village.

3. No credible strategy is being put forward as to how existing highway congestion pinch-points are to be relieved. These include Stockton Heath high street, Stockton Heath swing bridge, Lumb Brook underpass bridge, Knutsford Road swing bridge, and the Latchford/ Kingsway gyratory. The effects of the increased domestic and commercial traffic on the existing highway infrastructure will be enormous, i.e. A49, A50, A56, bringing increased pollution, noise and congestion.

4. LTP4 (apart from the Western link which adds little or no benefit for the majority of South Warrington commuters) excludes any significant improvements or forward investment in the south of Warrington's highway infrastructure in terms of existing roads and bridge crossings of all three waterways (Bridgewater Canal, Manchester Ship Canal and the River Mersey). Congestion at these key points will only get worse resulting in more pollution and potential Health issues.

5. There appears to be no coherent strategy for managing any adverse effects from increased HGV movements, including those that would result from the enhancement of Port Warrington, proposed Six/56 employment Park, proposed Stobart's national distribution centre, and Warrington Business Park developments etc. There is no rail or water access to either of the Six/56 and Stobart's, which will inevitably strengthen the focus of freight movement exclusively upon road vehicles. Both schemes contravene the Council's and Government policy in regard to supporting rail freight and sustainable use of existing waterways i.e. Manchester Ship Canal.

6. The Councils traffic model is unrealistic it assumes that the swing bridges are continually in place and do not open. Also, the age of the bridges could be a serious issue in the future due to increased openings and traffic usage. The model also makes no allowance for disruptive road works anywhere in the Borough, which is both illogical and unrealistic.

7. The concept of a Mass Transit System (MTS) is floated in LPT4, however it is clear from the documentation that the concept of developing a MTS is at a very early stage with little serious work having been undertaken, therefore it is unwise for the Council to put forward such a scheme without having carried out the necessary background work to establish its viability.

8. There is no clear strategy that ensures traffic generated by the Garden Suburb (both housing and the neighbourhood centre) will not have an adverse impact on the local community. The effects on the current highway infrastructure will be enormous, i.e. A49, A56, A50, and in particular Stockton Heath high street, Stretton village, Grappenhall Road, London Road, Lumb Brook under bridge, Wilderspool Causeway and Latchford village. There is also no evidence to support the assumption that the proposed Garden Suburb Southern Strategic Link Road will reduce traffic travelling from Stockton Heath via the A49 to the M56-J10.

9. Council officers have repeatedly stated that the Garden Suburb Southern Strategic Link Road is only illustrative, however it currently indicates a new traffic junction on the A49 (between the Cat and Lion Junction and the M56-J10). This suggestion will undoubtedly cause severe traffic congestion. This matter requires a fundamental review with Highways England, as this ad hoc illogical solution has the potential to create serious traffic congestion problems, particularly on the M56- J10 at peak periods.

10. The success of LTP4 is dependent on securing significant changes in public behaviour, **including walking, cycling and bus patronage.** No evidence is offered, other than optimistic hope, that these changes of mode, away from car usage, will in fact occur. The LPT4 also envisages tripling local public transport use during the Local Plan period. However, bus use has fallen by almost 50% over the past decade, therefore this laudable aspiration is very likely to be unattainable due to high car ownership, Town Centre retail decline, traffic congestion resulting in lack of certainty and reliability and relatively high fares.

11. The LPT4 makes no reference to replacing or undertaking a major review of the three 19th century swing bridges (c. 125 year old), therefore how credible or viable is a Local Transport Plan that fails to address the borough's reliance on Victorian infrastructure that is controlled entirely by a third party whilst proposing unprecedented large scale housing and employment developments without any surety of the necessary highway infrastructure to serve the resultant increase in traffic.

12. The conceptual high-level Cantilever Bridge replacement is only planned for the medium term which will present major planning problems. In addition, the PSV of the Local Plan indicates safeguarded land adjacent to the weight restricted Cantilever Bridge. A serious unanswered question is what will the new bridge be designed to carry? Will it include HGV's or be weight-restricted to light traffic as currently? There has been no regard given to necessary highway infrastructure and this is a major omission of public concern.

I hope these twelve questions offer some indication of the depth and breadth of scrutiny and research which has been conducted by RSWF. The working parties included people from a range of backgrounds, including transport consultants, mechanical and civil engineers and former senior managers in the transport industry. The resultant reports raise serious questions which Warrington Borough Council must address.

Whilst the reports are highly critical of the Local Plan and LTP4, I want to make it clear that Rethinking South Warrington's Future are not by definition anti-development. We are not simply raising these questions in a vain effort to avoid any development in the south of the borough. Rather, we want to make sure that we have both a Local Plan and a Local Transport Plan which work *for* the people of Warrington and, in as much as planning policy can, reflect the desires of the people of Warrington. The scale of development proposed in South Warrington is unacceptable in and of itself. To then provide infrastructure and transport proposals which completely fail to give the people of Warrington any confidence that such development could be achieved sustainably and with no detrimental impact to people's lives, is not only poor policy making but a fundamental failing of the Borough Council's obligation to serve the best interests of Warrington's population.

We look forward to receiving answers to all questions raised within the two reports and this letter and how the Council attends to address our concerns over the lack of soundness and questionable deliverability in both the Local Plan and LTP4.

Kind regards,

Councillor Ryan Bate
Chair
Rethinking South Warrington's Future

LTP4/PSV Local Plan – Transport Concerns

1. Introduction

Following the publication of the LTP4/PSV the RSWF Group felt it essential to undertake a critical view of the two documents in terms of transportation proposals for South Warrington

2. Brief.

The RSWF Sub Group undertakes a critical review of the LTP4/PSV in relationship to transport proposals and the potential impact on South Warrington.

3. General Observations.

Warrington's Transport challenges derive fundamentally from densely packed roads caused by constraints arising from:

- 3 waterways: The River Mersey, The Manchester Ship Canal[MSC] and The Bridgewater Canal passing through or near to Stockton Heath and Warrington Town Centre.
- Nearby motorways: The M6 (N-S), M56 (E-W) and M62 (E-W).
- Existing Railway networks

Traffic congestion and resulting air pollution is a major concern and affects the whole Town so the maintenance and preservation of adequate green space is essential/vital in providing an air quality counterbalance. Data taken from the World Health Organisation [WHO] ambient air quality database published on the 29th May 2018 names Warrington as one of the top 5 towns/cities in England that exceeds the pollutant limit. This is a damning report on the Council and exposes the lack of care and safeguarding being afforded to Warrington residents. Therefore the proposed additional 7,230-plus dwellings in South Warrington will have a deleterious effect upon air quality and noise, particularly in congested locations such as Stockton Heath high Street and Latchford village. **The RSWF Group have also produced a separate report that focuses on Air Quality and the negative impact these Plans will have on Warrington residents.**

The LPT4 and Executive Summary define a high level approach to addressing the challenges of the many transport problems in and around Warrington. The document title states that it is a PLAN but does not contain sufficient realistic detail to give credibility to a plan. It appears to be futuristic and aspirational in its view to resolve the major and minor issues which face the town. Most of the transport initiatives are medium to long term investigations and not beneficial implementable plans and do not benefit or complement the Warrington PSV Local Plan in a timely manner.

Some aspects of the LTP4 might in time be realisable and some would be welcomed e.g. the use of much improved and safer public transport services, making it easier for the 'last mile' of journeys into the Town centre for pedestrians and the proposed Bridge Foot link proposal.

Lack of commitment; the schemes, or possible schemes, listed in the LTP4 document will, in total, cost a very significant sum. Given pressures on overall UK public expenditure, and specific pressures on the Department for Transport, particularly from major metropolitan areas close to Warrington, There is little prospect that no more than a very small fraction of Government funding could realistically be achieved in the timescale of the Local Plan [2017-2037]. Almost all of the LTP4 is an aspirational wish-list, and [partly due to the uncertainty of funding] no timescales whatsoever are offered regarding delivery. Indeed, most schemes/ideas are still marked down as for future consideration over the next 5 year, with no detailed design work carried out to date and absolutely no commitment to programming

Discussions with Council traffic planners at the recent Councils consultation event have confirmed LTP4 as a 'concept' aspirational document which only outlines some options and some preferences. Therefore it lacks important detail for residents to make real judgements on the benefits a more detailed LTP4 plan might bring. If some of these options are eventually realised then attracting sufficient and constant funding for improved or new roads and bridges over waterways over the PSV period will be an enormous challenge in both phasing and funding.

Some of the LTP4 is dependent on securing significant changes in public behaviour, including walking, cycling and bus patronage. No evidence is offered, other than optimistic hope that these changes of mode, away from car usage, will in fact occur. It is ironic that the Council have presented the opposite showing trend patterns over the past decade showing a dramatic fall in bus usage

The LTP4 provides no credible strategy on how the Council intends to deal with and resolve existing highway congested pinch points. These include Stockton Heath High Street, Stockton Heath swing bridge, Lumb Brook Road Bridge, Knutsford Road Swing Bridge, the Latchford /Kingsway gyratory and the Bridgefoot/Bank Quay Rail Station area. Indeed some of the currently planned highway schemes may in fact worsen the situation. The Council's traffic model is unrealistic, it assumes that the three swing bridges are continually in place and do not open. It also seems to assume that there are no disruptive road works anywhere in the Borough. There are other detailed reservations about the model, particularly in relation to Public transport. It is also far too optimistically based upon traffic surveys undertaken during a week in June when the weather /daylight are both favourable and when many non –school-age families are on holiday. A wet week in late November might bring a very different set of results

The PSV Local Plan housing strategy places a major emphasis upon creating two major residential settlements in South Warrington i.e. The Garden Suburb and Walton which are both South of the three waterways. In complete contrast the LPT4 openly admits that the preponderance of workplaces, such as Lingley Mere, Omega, Town Centre, Railway Stations,

Gemini/Winwick Road Retail Park, Woolston Grange and Birchwood Science Park are North of the Three Waterways. This mismatch is wholly illogical, and is a recipe for growing and increasing intractable highway congestion.

The content of LTP4 will involve very significant funding on a scale that would challenge the resources of a major City. Funding appears to principally depend on the success of a proposed Workplace Parking Levy [WPL] initiative, broadly similar in its level to that in the City of Nottingham. However no detailed WPL proposal has been formulated or drawn up yet for Warrington. It is still wholly unclear as to the degree of geographical outreach such a scheme would have. For instance, would the WPL apply right across the Borough, including all employment areas [Gemini, Birchwood, Barley castle etc.] Would it be flat rate or contoured? How, if any, would exceptions be applied, such as for Health services, Emergency Services or other essential key workers Etc. The Council has not yet made available any details of their speculative WPL scheme and in deed it is questionable as to the Public and Businesses

Therefore it can be considered that both the LTP4 and PSV to be UNSOUND with regards to coherent credible major solutions to Warrington's transport challenges.

4. Priority Transport Infrastructure Initiatives.

The LTP4 identifies two initial major priority road schemes:
a) The Western Link.

From examination of the Council's Western link website it can be derived that the proposed new road facing tremendous technical challenges in the delivery of this ambitious project i.e.

- Traffic signal and controlled junction on the A56.
- High level bridge crossing of the Manchester Ship Canal. (Potential gradient issues).
- Under crossing of the Network rail London to Glasgow line (Victorian walled viaduct).
- Under crossing of the Network rail West Coast main line viaduct.
- New River Mersey Bridge.
- West/East Ditton goods/Arpley rail viaduct.
- St Helens canal bridge crossing.
- Sankey Brook bridge crossing.
- Cromwell/Sankey Way junction
- Construction of new highways from A56 to A57

Although now granted partial Government funding approval, there are real concerns that the budgeted £220M will not be sufficient to delivery such a complex and high risk civil engineering project, which undoubtedly due to the nature of the works will encounter unforeseen and likely extra cost delays. The high potential for underfunding gives doubt as to its financial viability. Furthermore the planned start on site is 2021 with anticipated completion and open to public 2024. It is therefore essential that confirmations of the total scheme costs are reaffirmed to ensure that the scheme is deliverable within its Outlined Business Case (OBC).

As LTP4 highlights this is a major priority initiative and no proposed enlargement of housing should be committed to until this scheme is delivered to avoid further traffic congestion and air pollution

Further observations:

- The first major comment is that the link will beneficially remove a large amount of traffic going through the centre of Warrington. However although this proposal will relieve the A56 Chester Road swing bridge, and Chester Road / Bridge foot, the Western Link will be wholly irrelevant to traffic heading to/from the Town Centre and the North Warrington'M62 employment belt' from the A49 corridor [to the South] and from the A50 corridor [to the South-east], and from the existing and proposed new settlements in between. In simple terms this project offers limited benefits to the majority of South Warrington residents and Businesses. This of course is based on the premise that this new Western link will remain toll free, otherwise traffic will continue to use Chester Road and Bridge Foot.

- The second comment regarding this link is its need. It is perceived the greater need is one of commercial advantage to support Port Warrington. This link would appear to be primarily concerned with servicing the needs of Port Warrington. As such, from available data provided by Peel Ports, it will be heavily used by LGV and HGV's (over 1000 HGVs movements per day). Serving the new port and facilitating better access to the M62 and Omega site to the North and the M56 and the potential Barley Castle Logistics site to the South.

- The design of the Western Link is a single carriageway road connecting two existing dual carriageways which would seem to be illogical and badly thought through from a future prospective, bearing in mind the aspirational and unjustified employment development objectives proposed by the Council. It is interesting to note that when Council officers were challenged at the Council's consultation event on the single carriageway design their response was that of economic and financial constraints as the determining factors. Therefore the proposal shows a gross inconsistency with other strategic infrastructure routes. To simply state that the Council has gone ahead with a scheme that ultimately may fall short due to its design on the basis of financial constraints is both unacceptable from the public purse prospective and unsound transport planning.

- The approved Centre Link will undoubtedly create increased traffic problems on the existing roads in the area i.e. Gainsborough Road. This coupled with the Western link has the potential for a perfect storm in terms of traffic congestion resulting in existing localised pinch points becoming saturated and overloaded

- The overall benefit of the Western Link to the existing highway infrastructure is highly questionable London Road [A49] and Chester Road [A56] as the vast majority of residents in South Warrington travelling north are extremely unlikely to use the

Western Link to access services or employment within the Town Centre. Indeed with the proposed residential growth the current level of traffic congestion will be exasperated.

b) Garden Suburb Southern Strategic Link (GSSSL).

This link, described within the PSV documentation as an '**illustrative link'**, it is also termed as an 'enhanced contingency'. It has been indicated as a conceptual route on PSV maps running from the A49 via the Garden Suburb to meet up with the B5356 at the proposed very large Langtree Six/56 employment area and then on to the A50.

It is interesting to note that the Six/56 development with its lack of rail access, demonstrates that the Councils policy for developing multimodal freight transport facilities in order to assist in the sustainable movement of goods is flawed and patently not being practised. If it was then a rail served site would have been put forward.

It is realistic to assume that GSSSL would attract HGV usage unless strict weight restrictions are applied. Otherwise the route will become a heavily used goods and freight road that will have an environmental impact on the area in terms of air pollution and noise.

The current route of the GSSSL will take it past Three Schools and takes no consideration of the consequential Air pollution, noise, and dangers that accompany a road of this nature.

As stated in the Councils 'Infrastructure Delivery Plan 2019' the estimated cost for this road is £93M and currently no source of funding has been identified. Yet again it is planned for the medium term despite assurances from the Council that Infrastructure developments will be in place before housing is developed.

There is no clear strategy that ensures traffic generated by the Garden Suburb will not have an adverse impact on the local community. The effects on the current highway infrastructure will be enormous i.e. A49, A56, A50, in particular Stockton Heath High Street, Stretton Village, Grappenhall Road, London Road, Lumb Brook Bridge, Wilderspool Causeway and Latchford Village, etc.

There is no evidence to support the assumption by the Council that the proposed GSSSL will reduce traffic travelling from Stockton Heath via the A49 to the M56. It is illogical to think traffic would divert onto the proposed GSSSL and then be confronted with another traffic junction beyond the Cat and Lion Junction and before junction 10 of the M56.

The aspirational vision of an enhanced contingency comprising of a part dual carriageway road being made for a futuristic mass transit system is totally without substance**.[Refer to section 7 for further details]**

The Council have alluded to within their background documentation that the Garden Suburb will incorporate an enhanced vehicular movement network. The objective will be to use this network to improve linkages to the Town Centre, particularly through enhanced public

transport networks. The primary loop being a transport corridor linking Warrington Town Centre via the A49 and A50. However much of the Garden Suburb will not be directly serviced by such a bus, unless if performs a protracted service of zig-zags. Then in trying to reach the Town Centre it will have to contend with London Road and Stockton Heath High Street Traffic congestion (no possibility of a bus lane unless substantial demolition is undertaken) or the A50 Knutsford Road and Latchford Village traffic congestion (ditto ref demolition).

There also appears to be no appreciation of the consequential traffic flows in regards to the proposed Garden Suburb Neighbourhood Centre and the anticipated increased traffic movements on both the A49 and A50

The LTP4/PSV takes little or no consequence of the fact that the existing South Warrington highway infrastructure is already at saturation point at peak periods and unless there is a massive investment in improving the existing roads and bridge crossings of all three waterways (Bridgewater, MSC and River Mersey) their plans are doomed to failure and will cause unacceptable hardship to local residents.

The proposed junction between the GSSSL and the A49 in Stretton is ill-conceived and would undoubtedly cause severe traffic congestion at Junction 10 of the M56. This matter needs a serious review with Highways England. There is a complete lack of clarity from the Council, as officers have repeatedly stated that the GSSSL is only currently illustrative and therefore the LTP4/PSV lacks credibility as significant traffic congestion issues are not being addressed, with adhoc ill-thought out solutions being proposed.

Therefore the case for the Southern Strategic link as outlined within both the LTP4 and PSV is fundamentally lacking in substance and is UNSOUND.

c] Costings

Throughout the Councils documentation there are inconsistences in particular the 'Council's Infrastructure Delivery Plan 2019'.

For example an allowance of £55m has been set aside for the replacement high level cantilever bridge [which is assumed to be based upon a similar weight restricted bridge], however the Western link high level crossing of the MSC, which is much more substantial and will be carrying HGV's is only costed at £24.4m. How can a bigger and more complex bridge cost less!!

5. Active Travel Policies

The Active Travel Policies AT1 – AT9 appear to be a laudable set of policies to ensure the vision of a healthier Warrington resident is facilitated through walking and cycling. Even though evidence has been presented to support this shift towards this healthier view for the younger population. It however is a very optimistic view to assume that the population will adopt this view.

In addition what cognisance has been paid to the topography of South Warrington i.e. It is very hilly and the gradients on existing routes do not lend themselves to commuter cyclists.

The active travel policies do not address the obstructions presented by the three main waterways which isolate the southern area of Warrington to the Town Centre. There would appear to be no transport infrastructure identified within the Council's 'Infrastructure Delivery Plan 2019' to facilitate ease of walking or cycling into the centre of Warrington other than the existing network.

The LTP4 also states that 'there will be a local cycling and walking Infrastructure Plan', and 'The enhanced Green Space and Waterways network…. Will provide high quality walking and cycling routes'. However, such cycling and walking networks need to be both comprehensive and continuous, as there is only limited value in providing isolated lengths of walkway/cycleway that end at complex multi-lane junctions or large roundabouts. Indeed the LPT4 admits that the present Town Centre is 'Impenetrable' for cyclists. These comprehensive networks also need to be in place in advance of demand, not slowly developed piecemeal. The total cost will be significant, and will involve giving priority to ' Green ' transport modes at key junctions, the very reverse of Warrington's present situation. There will consequentially be an adverse effect upon motorised general highway traffic, which has not been factored into the Council's transport modelling, as clearly schemes have not yet been designed. Therefore there seems extremely little likelihood of comprehensive walking and cycling networks being planned, funded and constructed as to be fully in place by the time the proposed settlements are constructed in South Warrington

Therefore this set of policies as a whole is lacking and therefore UNSOUND as an overall objective.

6. Smarter Travel Choices Policies

The Smarter Travel Policies ST1 – ST11 are once again laudable policies but they are largely supportive of the Active Travel policies. All these ST policies rely on a social shift, which is a very optimistic view especially for the older population.

Social change has to be targeted at the full age range of the population. These policies do not address the older generation and their needs. ST7, regarding bus travel and improvements specifically needs to address this. However, these policies are minor with respect to the bigger picture of the problems facing Warrington's congestion and air pollution problems. The vast majority of ST policies are to continue or support existing initiatives and to investigate a very small number of newly defined and sufficiently detailed that really give people any valid options. Bike sharing (ST3) from the South of the Borough will not happen due to the difficulty of getting over the waterways safely.

The town centre car club (also ST3) is an aspirational pipedream and will realistically not happen.

7. Passenger Transport Policies

Passenger transport policies PT1 – PT19 are targeted at two main areas, bus and rail initiatives. Both are vital to the smooth running of an effective transport system throughout Warrington and with the wider country. These policies seem to have a sensible outlook. However, once again, given the waterway barriers separating North and South Warrington there are no plans to address or improve local connectivity to effectively support PT policies or solutions. There are no rail links in South Warrington so that is a none starter. There are no proposed improvements defined in the Councils 'Infrastructure Delivery Plan 2019' to invest in improving the many small crossings of the Bridgewater Canal, nor the MSC or River Mersey. The only major construction planned to connect north to south is the Western Link which in no way serves the PT policies.

The introduction of Mass Transit System such as a Light Rapid Transit[Tramway]or guided bus system can be attractive in reducing car usage and air pollution, however before such a system could be considered as a potential solution to Warrington's future public transport needs it would need to undertake a rigorous examination.

This would require carrying out a major feasibility exercise to look at issues such as detailed Route and Station planning, connectivity, integration with existing public transport operations and facilities, land availability, Legal processes, passenger demand forecasting, funding sources, full cost benefit analysis, park and ride opportunities and the potential impact on existing property owners. A fundamental issue to be considered is the impact of the introduction of such a system on the existing road network and waterway crossings in terms of construction and future operation.

The LTP4 states both that 'we [WBC] will identify options, and that the concept of developing a Mass Transit system…..is at a very early stage', both of which suggest no detailed thinking has yet occurred , let alone the employing of specialist consultants . Yet LTP4 also inexplicably states 'Early work confirms that a Mass Transit System could be commercially viable'. These contradictory statements suggest that the idea of a Mass Transit System has only been added into the LPT4 at a very late stage, and that little serious work has yet been carried out. It is seemingly being put forward [High profile], as if it will become a reality within a few years , when in reality there are likely to be far more detailed proposals already in existence elsewhere in other local Authorities who are well ahead in the queue for scarce Government funds

None of the above appears to have been carried out so far by the Council therefore it can reasonably be assumed that the inclusion of a Mass Transit System in the LPT4 is no more than a wish and should in no circumstances been seen as an answer to the overall road traffic and transportation issues identified within the PSV Local Plan and faced by South Warrington

The LTP4 also envisages increasing local public transport use by three times during the Local plan period. However, bus use has fallen by almost 50% in a decade partly due to;
*High car ownership
*Town Centre retail decline
*Unreliable Bus services

*traffic congestion and lack of certainty and reliability
*Withdrawals of services
*Relatively high fares

Even one of the above factors will prove very challenging to reverse, let alone all six in combination. The laudable aspiration to treble bus usage may therefore be largely or even wholly unrealistic and unattainable

Therefore, as a set of policies it provides little benefit to South Warrington and is considered as an UNSOUND plan.

8. Safer Travel Policies

Safer travel policies RS1 – RS18 do not appear to provide any new concepts that those already generally used throughout the Borough. As an ongoing set of policies they need to be effectively implemented. They complement and repeat many policies covered by other sections of LPT4.

9. Cleaner Fuel Policies

Cleaner Fuel Policies CF1 – CF4 are woefully inadequate taken into consideration that CF2 and CF3 commission studies into alternative fuel within the 0-5 year period. These are priority issues affecting Warrington's poor air quality record and should in fact be addressed urgently.

EV charging points (CF4) on all new housing developments is a planning issue and should be initiated immediately and not within 5 years. This is a Developer reserve matters requirement and it does not need a 5 year review to implement a sensible and environmental option for new homes.

10. Asset Management Policies

It is noted from comments in the Councils 'Infrastructure Delivery Plan 2019' *that current LTP budget allocations are insufficient to prevent ongoing network deterioration'.* With this acceptance by the Council it is deemed that the Asset Management policies which look after all network roadways and structures within the Borough will not achieve their objectives and will continue to deteriorate with the Council eventually being faced with extremely high repair or replacement costs during the Local Plan period and not least Public exposure to Health & Safety issues.

This is an UNSOUND and unpalatable plan.

11. Network Management Policies

This set of policies NM1 – NM13 are a set of normally expected requirements to keep the network in a viable and workable condition, with new measures targeted to be introduced to improve network operation. However, NM11 is the Achilles heel in the whole roadway

system serving South Warrington. Peel Ports has ownership of all the swing bridges and the Cantilever Bridge within the Warrington network system. Peel Ports also has full control over the operation and maintenance of these bridges. Although WBC continues to work with Peel to maintain traffic flow, Peel has the right to operate the swing bridges at any time to facilitate vessel movements. Operationally this is going to become a major problem with the proposed increase in vessel movements to facilitate Peel Ports investment in the new various port facilities and thus leading to circa a 10 fold increase in container movement via the MSC. This will potentially have a detrimental impact on traffic to and from the South of Warrington and will potentially grid lock traffic to and from South Warrington. Even the Western Link, if and when it is eventually built, will not solve this problem.

Furthermore, the possibility of the conceptual high level cantilever bridge replacement is only planned for the medium term which will present major planning problems. In addition the PSV indicates safeguarding land adjacent to the existing weight restricted Cantilever high level bridge. An unanswered serious question is what will the replacement Bridge carry i.e. HGV's or light traffic? Also there has been no regard given to necessary highway infrastructure [whether it is for HGV or Light traffic]. This is a major omission and is raising Public concern.

The three swing bridges were designed and constructed over 125 years ago when the MSC was opened in 1894. The bridges originally served a far lighter load than those being imposed today. It must be assumed that they are well past their design and operational life span and it is doubtful, due to wear and tear, whether they will contend with the proposed increase in Vessel and Traffic movements without having to undergo major refurbishment or total replacement. It must also be noted that the LTP4 makes no reference to replacing or undertaking a major review of the 19th century swing bridges therefore how viable is a Transport Plan that fails to address the Council's reliance on a Victorian infrastructure that is controlled entirely by a Third Party

This Network Management policy is UNSOUND when applied to keeping traffic flowing to and from South Warrington.

12. Freight Management Policies

This set of policies, FC1 – FM16 give the greatest cause for concern within LPT4. The future increase in LGV and HGV traffic movements within the Warrington Network will dramatically increase, despite data disclosed in the document. With the proposed Port Warrington adding over a thousand additional HGV vehicle movements daily north to the M62 and south to the M56. This coupled with the proposed Six/56 Logistics Development and Stobart's potential development; both will flood South Warrington with LGV and HGV's. This will have a severe impact on the local roadway infrastructure and it will introduce increased levels of vehicle emission pollution and noise, and not to forget the additional traffic congestion.

The case made for containerised freight shipping movements and intermodal facilities reducing road freight movements is subjective. Once containers are offloaded at Port

Warrington HGV's will be required, via the Warrington Highway system, to deliver them to their final destination.

There appears to be no coherent strategy for managing any adverse effects from increased from increased HGV movements, including those that would result from the establishment of the following;

*Stobart's National Distribution Centre
*Six/56 Development
*Port Warrington Development
*Warrington Business Park Developments

It is accepted that Port Warrington will be serviced by the MSC and by rail [West Coast Main Line], there is no rail or water access for either of the proposed major logistic centres [Stobart's and Six/56], which will inevitably focus freight movement exclusively upon road vehicles [vans and HGV's]. Also, in contrast to proposals for cars, there are no proposals to phase out diesel propulsion for lorries. The Six/56 and Stobart's developments contradicts the Council's and Government policies to support rail freight and increased sustainable use of the existing MSC, in preference to the undesirable alternative of road haulage to inland destinations from the Port of Liverpool.

Warrington will become a town surrounded by an HGV commuter belt, which will ultimately strangulate Warrington and further increase the current unacceptable air pollutants that have an adverse effect on resident's health and wellbeing

The Freight Management policies are deemed to be UNSOUND

Conclusion

In summary, LPT4/PSV Local Plan do not make adequate provision for transport between the proposed new housing estates of South Warrington and Warrington town centre. The most likely result would seem to be that the development takes on the status of a dormitory town; the precise opposite of the Council's stated objective. The proposals of LPT4 are at best speculative with little substance and limited detail to support them.

Its current soundness and deliverability exposes the very foundation of the PSV Local Plan and ultimately fails to serve the residents of Warrington, specifically those residing in South Warrington.

APPENDIX 1 provides an in depth detailed commentary on the failure of the LPT4/PSV Local Plan to effectively address Warrington's transport issues, in particular South Warrington.

APPENDIX 1

Warrington Local Plan

Submission on the Adequacy of the Local Transport Plan 4 (LTP4) In Relation to the Local Plan

This document identifies a number of serious shortcomings in the Warrington Borough Council Local Transport Plan 4 (LTP4), that are directly relevant to the soundness, or otherwise, of the Local Plan.

The Local Plan proposes:

- 4,200 new dwellings in three large housing estates referred to as a "Garden Suburb", stretching from Appleton through Stretton to Grappenhall and almost as far east as J20 of the M6 (this is in addition to 1000-plus additional dwellings already approved and being built)

- 1,600 additional dwellings in Walton

- 430 additional dwellings in Lymm (total 7,230-plus)

Our view is that the detail, affordability and deliverability or otherwise of the many elements of LTP4 is crucial to the soundness or otherwise of the Local Plan.

This document sets out many criticisms of what is a flawed and highly-overoptimistic Local Transport Plan, that is underpinning what is therefore consequently an unsound Local Plan.

The central flaws of the Local Plan and Local Transport Plan are:

- The stark contradiction between the extreme likelihood of most of the housing in South Warrington being built but the extreme unlikelihood of most of the transport infrastructure actually being funded and built, in a local and national economic environment where public finance will be very limited, and where there will be many well-argued competing claims from other parts of the UK

- A difficult-to-accept assumption that travel habits of residents in both new and existing settlements can be radically switched away from the private car to walking, cycling and public transport

- The obviously-flawed concept, when the vast majority of workplaces plus the Town Centre and the town's two main-line rail stations are on the **north** side of the River Mersey, the Manchester Ship Canal (with its opening swing bridges) and the Bridgewater Canal, of concentrating massive new residential development on the **south** side.

- Detailed flaws in the transport modelling input into the Local Transport Plan 4

- An apparent planning philosophy that promotes each of the various separate elements of new development in Warrington in isolation, but fails to look at the collective congestion effects on Warrington, particularly South Warrington, of what would occur if all these elements went ahead (as they might well do), in combination.

The AECOM Report

This section examines the technical input document by AECOM, *Warrington Multi Modal Transport Model Local Plan Reports*. This is one of over twenty technical documents forming the evidence base that Warrington Borough Council will use in support of its development proposals in the Warrington Local Plan, and its accuracy is clearly crucial to LTP4. The AECOM report is referenced where quoted.

The AECOM report noted (this in 2016) that WBC was preparing a spatial strategy for the Warrington Local Plan, including what now has been set as an extra 18,900 dwellings (nearly one thousand per year) over the next 20 years (an even higher figure was mentioned in the AECOM report). The AECOM report noted that these additional dwellings are expected to impose what AECOM describe as "significant pressure" on the transport network.

The AECOM report notes that (quote):

- "it will be particularly important that soundly based evidence justifies the associated transport strategy, for the final consultation of the preferred spatial strategy prior to an Examination in Public (EIP)"

Comment: this highlights the crucial importance of transport evidence. There is plenty of analysis, some of it based upon debatable data. But, when it comes to the "transformational" solutions being put forward, there is no guarantee whatever that even a very modest proportion of them will be fundable. There is thus a raw mismatch between "housing developments" (which will happen) and "transport improvements" which are little better than speculation.

- "The model is required to underpin the appraisal of a variety of transport proposals, notably a major western route, Warrington Western Link, providing access to potential development along the Manchester Ship Canal and providing improved connectivity to the west of the town centre, together with relief and resilience to the town centre road system."

- "There are requirements to liaise with Highways England to identify and prioritise investment in the motorway network, the operational performance of which is critical to Warrington's own highway network. There is also a need to consider and prioritise other investments and management plans for the transport system." (p14)

The AECOM report set out to:

- "Represent the existing transport networks within Warrington, and performance at present"

- "Understand the traffic impact of the site-specific allocations of the Warrington Local Plan on the local highway network"

- "Develop realistic mitigation measures to support these allocations (of development) and test them to understand their benefit and their impact on traffic patterns - the results can then be fed into a transport strategy and associated infrastructure planning", and

(see earlier comment)

- "Undertake detailed feasibility work on Warrington transport infrastructure projects such as Warrington Western Link" (AECOM report, p16)

Comment: the major component of the highway proposals is the Western Link. But the preponderance of the housing proposals are south or south-east of the town.

Question: why promote maximum growth in a sector of the town that is not going to be served by the proposed Western Link?

The AECOM report states: "Within the Fully Modelled Area (FMA), all motorway, A and B roads are included, as well as a substantial number of additional minor roads where these provide a through route…….The external area consists of motorways and A roads only" (p17).

"The network that is simulated comprises 498 zones (488 of them in the Borough) and 5,150 links between 2,484 nodes (of which 173 are external to the Fully Modelled Area".

"The network includes 2,053 junctions where there is "priority", 135 signalised junctions, and 87 roundabouts". (p19).

"Saturation flows have been calculated and applied for each junction within the SATURN simulation network. "Saturation flow" is defined as "the maximum number of passenger-carrying units per hour which could make that turning movement provided there were no other vehicles on the road, no red lights to oppose it, etc"." (p20)

Question: how does the model take account of ever-changing incidence and location of road works? Does the model assume there are no road works, anywhere in the Borough, ever?

The report states that the following toll locations were identified (and toll rates were implemented in modelling):

- Mersey Tunnels, Kingsway and Queensway
- Warburton Bridge

Question: why is there is no mention of the tolled Runcorn bridges (the Mersey Gateway bridge opened in 2017) in the AECOM work? The fact that both bridges are tolled, whereas the older of the two, the former Runcorn Bridge, was not previously tolled The very recent introduction of tolls could obviously be expected to affect modelled traffic flows in Warrington.

Question: how is cycling to be modelled? (particularly as there is a tendency to use minor roads and paths that are not included in the network). Some cyclists also choose routes that are safest, but not necessarily quickest. Is this factored-in?

A three-ton weight limit was included in the modelling for the Cantilever and the Warburton bridges.

Question: will any replacement Cantilever Bridge be built to a full 44-tonne weight limit? If so, what impact will this have on HGV routeing on the south side of Warrington?

Also, if a new Cantilever Bridge is built, what will the feeder-route highway network be at its southern end? Will there be greatly-increased traffic on (the very narrow) Hunts Lane, and Ackers Road? Or the narrow and winding A56 Chester Road? And how would the consequential increased congestion at the single-file Lumb Brook Bridge be dealt with?

AECOM Modelling of the Public Transport Network

The public transport network includes bus operation and walking on each modelled link, rail route links, and some walk-only links within the town centre.

The public transport network was coded to represent:

- "All bus services operating within, to and from the Borough, except privately-run (non-scheduled) services and school buses, and

- All rail services stopping at stations within the Borough"

Question: bus services are frequently disrupted by congestion, bridge openings etc. How does the model take account of the unreliability of bus services due to these causes?

Question: as the "school run" is a major generator of peak period traffic, and school buses provide an alternative, isn't it illogical to exclude them from modelling?

AECOM Surveys and Other Assumptions

The AECOM report states that for time periods, the base year of the model is 2016 and represents "an average neutral weekday in June". (p23)

Question: is this realistic? June is not a typical month, and will fail to take account of prolonged hours of darkness, which affects the peaks (particularly the evening) for several months of the year. Nor will it take account of very poor weather. It is also a period when significant numbers of people are on holiday (not necessarily away from the Borough), which

could be expected to both depress peak commuter and alter offpeak leisure travel patterns. The choice of June may also very heavily influence walking and cycling levels.

"It has also been assumed that the swing bridges are not in operation and are open to traffic throughout the modelled time period." (p23)

Question: is this realistic? Bridges swing several times each day. A typical "closed to traffic" interval is 14-15 minutes (this has been timed).

The AECOM report states: "The Public Transport survey data was categorised within the AM peak, inter-peak and PM peak periods of 0700-1000, 1000-1600 and 1600-1900. The Public Transport model time takes an average of these time periods to represent average time period hours."

Comment: the choice of 1000 is questionable, and arguably inappropriate, given that off-peak travel on rail, and free or offpeak travel on buses, commences at 0930. The report later says, on p24, that no split between fare/non-fare paying has been used, again questionable. The report notes later on p27 that an "average" fare is used, that takes account of season tickets, day fares and concessions.

The report notes (p25) that during model calibration, it was found that HGVs favoured cross-town routes rather than "more realistic" motorway routes, and that an artificial reduction of 10p per km was then made to modelled HGV costs via motorway links until "realistic" cross-town routes were observed. If this is the case, then it suggests that the routeing of HGVs is very sensitive to perceived operating costs (such as congestion) and that HGVs will readily re-assign their movements from motorways to cross-town routes.

Question: why have several different scenarios not been offered for HGV movements, given that they are so sensitive to minor variations in perceived cost caused by hour to hour congestion varying on the motorways?

The report notes (p27), in relation to how waiting-time was modelled: "Given the relatively high frequency of many bus services, a flat "headway" factor was applied".

Question: is this appropriate for the south side of Warrington? South/south-east/south-west of Stockton Heath village centre, urban Grappenhall and the Cobbs Estate, there are no instances of buses offering a combined frequency of more than half-hourly. This does not fit with the description "relatively high frequency".

Buses

Question: how does the survey take account of any ongoing decline in bus service provision or bus use during the next twenty years? (the last twenty have seen a succession of cutbacks, plus a very small number of new routes).

Question: how does the bus survey take account of future real-terms fare rises?

Under “Quality Assurance” (p29), the AECOM report states that the data-collection process did not highlight any obvious anomalies. However, data cleaning flagged-up count sites that needed to be treated with caution during calibration/validation of modelling. (p30). This suggests that there were nevertheless some significant problems with obtaining locally-accurate public transport data.

Traffic Flows

The AECOM report noted that in South Warrington (south of the town centre rather than the MSC), observed traffic flows exceeded 1,000 vehicles per hour at the following locations in the morning peak, inter-peak and evening peaks, as follows:

- (AM peak) A56 Walton, A50 Kingsway Latchford
- (inter-peak) None
- (PM peak) Chester Road swing bridge

The AECOM report noted that observed traffic flows of 750 to 1,000 vehicles per hour were:

- (AM peak) Chester Road swing bridge, Knutsford Road at Victoria Park, Knutsford Road swing bridge
- (inter-peak) Chester Road swing bridge, Kingsway Latchford, Knutsford Road swing bridge
- (PM peak) Chester Road (north of the swing bridge), A56 Walton, Knutsford Road Victoria Park, Knutsford Road swing bridge, A50 East of Grappenhall towards J20 (pp42-44).

The AECOM report notes that all four MSC crossings were re-surveyed in May 2017, following errors on the A49 Stockton Heath swing bridge count.

It may be significant that these re-surveys found major variations over the original-survey data. For example, in the morning peak, inter-peak and evening peak, Ackers Road northbound in 2017 was found to be 39%, 30% and 47% up on the original dataset. Southbound, it was found to be 30%, 11% and 17% higher.

There were other variations, for example Chester Road northbound in the evening peak was 12% up and Knutsford Road northbound evening peak was 14% up.

It is reassuring that these variations were detected, but concerning that such big variations could occur in the first place.

Question: is WBC wholly confident that the AECOM model is accurate every day of the week, all the year round, in relation to the crucial issue of congestion at the Mersey, MSC and Bridgewater Canal crossings? All these crossings are already stressed. And the AECOM

model assumed that the swing bridges were open to highway traffic at all times, which is plainly factually wrong. Bridge swings are a crucial issue.

The AECOM report noted that on motorways (p46), data was downloaded from the Highways England TRADS sites at a total of 88 sites (10 on M56, 50 on M6, 28 on M62).

For all time periods, the AECOM reported (unsurprisingly) that the M62 is the slowest of the motorways, and the M56 the quickest (p74).

Bus Surveys

For bus surveys inputted into the AECOM model, there seem to have been some problems. Passenger surveys were conducted for 22 service routes, with a target of 5,000 surveys (in fact, 5,580 surveys were recorded).

However, the AECOM report states (p76) that 1,300 survey records related to interviewees refusing the survey partway-through or there being a technical problem. This presumably reduced the usable number to 4,280. This reduces the surveys to an average of 194 per bus route, which seems rather small.

There were a further 1,683 interview forms handed out, with just 395 returned. The AECOM report then claims this increased the total sample to 4,353 (NB, we make it 4,675). Even 4,393 across 22 routes is only 200 per route, still small.

The report admits that data cleaning for the bus survey was extensive and time-consuming.

Question: is WBC wholly confident that bus survey work was robust, given the small number of surveys and the data-cleaning difficulties?

Data received from Network Warrington and Arriva was for 18th June to 1at July and for 1st June to 8th July respectively.

Question: it is questioned as to whether these constitute typical weeks, as (as previously commented) significant numbers of people are on holiday during these times, depressing peak travel and possibly inflating off-peak travel.

Rail

For average daily passenger entries/exits, the report lists entries/exits for seven stations (it is assumed that “average daily” means “average weekday”, Monday to Friday):

(station)	(entries)	(exits)
Birchwood	1,407	1,266
Glazebrook	55	50
Newton-le-Willows	779	728
Padgate	357	229

Sankey	285	228
Warrington BQ	1,666	1,854
Warrington Central	2,199	2,354

The AECOM report notes that, in order to have confidence in the surveys, and due to lack of staff, a second round of surveys was conducted. The AECOM report noted that the absolute difference between the two survey days was only 3%, but only the first-day survey data was used, as this matched the day the passenger interviews were conducted. (p78).

The percentage of passengers surveyed was in all cases over the minimum target. However, sample sizes were small for Birchwood (only 29%) and Warrington Bank Quay (just 23%), and actuall numbers sampled were small for both Padgate and Sankey (both only 50).

Question: is WBC confident that the rail surveys were sufficient in number?

The AECOM model's survey pre-dated the diversion of TransPennine services to Leeds/York from Warrington Central to Newton-le-Willows, and also may have coincided with the protracted periods of unreliability on both the Warrington Central and the Newton-le-Willows routes due to industrial action by guards, and (in the case of Newton-le-Willows) prolonged engineering work associated with electrification. The survey also obviously pre-dates the projected opening (2019) of Warrington West as a replacement for Sankey.

Question: how was/is the diversion of TransPennine services to Leeds/York away from Warrington Central from May 2018, the opening of Warrington West (a potential P&R site for Walton) and previous industrial action on both the Warrington Central and the Newton-le-Willows routes (now a major "hub" park-and-ride station following upgrading) taken account of in the model?

Freight Modelling

The AECOM survey report freely acknowledges that "freight movements are typically difficult to capture in urban transport models" (p81). Eight specialist goods vehicle counts were undertaken, together with 19 freight-operator interviews at bases or by phone.

Question: how can WBC therefore be confident regarding the accuracy of future predictions of HGV movements, in relation to South Warrington?

Car Parking

The report notes that car parking surveys were undertaken at ten sites. A major new car park has been constructed in Warrington town centre since the AECOM survey.

Question: how does the AECOM model deal with the opening of new car parking capacity in the Town Centre?

Traffic Speeds

The report confirmed (unsurprisingly) that traffic speeds were very low (below 10mph) in certain parts of South Warrington, even during the inter-peak period (p87-88).

Question: if traffic speeds are already very low, how will these improve following the infusion of many thousands of new homes in South Warrington, short of providing a massive and obviously-unaffordable new highway network?

The AECOM report noted that the AECOM survey used traffic signal timings from 80 junctions within the Borough. Of the 80 junctions, 49 are demand-responsive, as part of the SCOOT traffic control network. Other signal settings were obtained from Highways England.

Question: does the model use traffic speeds based upon what is legally permissible, or what is actually observed (which might be higher than permissable)? Similarly, it is common for vehicles to jump amber or even red lights at junctions. Does the model assume this practice continuing?

Bus Fares

On bus fares (p109), a "representative yield per km" is generated, based upon observed data. This is therefore not based upon the fares of individual operators. NB one bus operator has ceased operation since the date of the AECOM survey, thus altering frequencies on certain corridors.

Question: why is bus use modelling not based upon actual fares? Has the model taken account of the withdrawal of one operator's services?

Warrington Borough Council Local Plan - Garden Suburb Transport

The Local Plan report notes that the Garden Suburb envisages three "villages", villages A, B and C, and the very large employment area that has become known as Six-56, plus a "neighbourhood centre roughly in the centre of these four developments.

- Village A extends eastwards from Dudlows Green and the London Road/M56 intersection, as far as Appleton Thorn.
- Village B is Grappenhall Heys, as far north as Bridgewater Canal., and including Grappenhall village conservation area.
- Village C is further east, extending eastwards up to the A50 and southwards to the B3656 Grappenhall Lane, as far eastwards as the roundabout west of J20 of the M6. It is separated from village B by a proposed small country park.
- The Employment Area fills the land between the B3656 and the M56 and the M6. At the west side, it adjoins the Barleycastle trading estate.

The Garden Suburb Development Framework states, under "Vehicular Movement Structure":

“Warrington Garden Suburb will incorporate an enhanced vehicular movement network through a series of new and upgraded routes. These improvements will be phased over time in response to development trajectory, and in order to link new and existing communities.”

Question: the phasing will depend on funding, which is very uncertain and outside the control of WBC. So how can the assurance of investment in new routes be taken seriously?

The Local Plan states that “The overall objective will be to use this network to improve linkages to the Town Centre, particularly through an enhanced public transport networks (sic) that generate greater patronage of the routes by users and consequently yield superior viability to public transport operators.”

It also states: “The primary loop is seen as the principal public transport corridor linking back to Warrington via the A49 and A50.” (p56)

This suggests a half-hourly bus looping through the Garden Suburb, reaching the town centre via the A49 (clockwise) or the A50 (anticlockwise). But much of the suburb will not be directly served by such a bus, unless it performs a series of zig-zags. And reaching the town will have to contend with London Road and Stockton Heath High Street congestion (with no possibility of a bus lane) or the A50, Knutsford Road and Latchford congestion (ditto).

Question: how can a relatively low density (in overall terms) settlement, scattered over several square miles, be efficiently served by buses? And “loop” routes are inevitably indirect and slow/uncompetitive for those living halfway round the loop.

Question: how will buses be given priority when attempting to rejoin the A49 and using the A49 through London Road/Stockton Heath, and attempting to rejoin and using the A50 through Grappenhall/Latchford (both corridors including swing bridges), when there is no physical scope along the full length of either radial route for creating bus priorities, in terms of segregated bus lanes?

Warrington LTP4 Evidence Base Review

This document provides the evidence base that underpins the credibility of the Local Transport Plan 4, which in turn underpins the soundness or otherwise of the Local Plan. The evidence base pre-dates LTP4, in some cases by a matter of several years.

Under “Key Findings” the LTP4 evidence base report states (under “Employment Distribution”, para 2.1.4):

“A T-shaped distribution of employment is observed in Warrington; employment is concentrated in the town centre and along the M62 corridor to the north of the town centre, at Omega, Gemini and Birchwood.”

If this is the case, it suggests that there will be very significant into-town or cross-town commuting from any new settlements in Higher Walton, Grappenhall and Lymm.

Question: how will an uncongested transport corridor, or safe routes for cycling, be created between new settlements in Walton, Stretton/Higher Grappenhall and Lymm, and the concentration of employment along the M62 corridor at Omega, Gemini and Birchwood? This question is the very heart of the projected future peak-period congestion debate.

Under "Journey Times and Congestion", para 2.2.2, it specifically mentions:

- The town centre
- Waterways crossings, including Wilderspool Causeway, Bridgefoot Gyratory, Brian Bevan Island and the A50/A5031 gyratory
- The approach to the town centre, including the A49 and Knutsford Road
- Motorways access, including the A50 accessing the M6

Comment: all of the above locations will be directly in receipt of worsening congestion from new development at Walton, Stretton, Higher Grappenhall and Lymm. (See earlier question)

Under "Travel to Work", para 2.2.3, it states:

- car commuting has increased from 72.1% in 2001 to 73.9% in 2011
- car commuting is higher than the NW average and the New Towns average
- only 10.5% of Warrington residents use active travel to get to work, compared with 15% in Peterborough and 14% in Northampton
- commuting to the town centre is dominated by the car (73%), despite public transport alternatives

Under "Car Ownership", para 2.2.4, it states that 81% of Warrington residents own a car, compared with the national average of 74%.

Under "Rail Travel", para 2.2.5, it states that the number of rail users is growing. However, none of the proposed new developments at Walton, Stretton, Higher Grappenhall and Lymm will be rail-served, and it seems inevitable that new residents in these areas will have to access Warrington Bank Quay and particularly Warrington Central, with its fast links to Liverpool and Manchester. This would be mostly by car, adding to congestion on roads leading to the town centre.

Question: in the context of where rail stations are, it is perverse not to concentrate new development (for example) around Birchwood station, the southern 180 degrees walk-in catchment of which is agricultural land similar to Stretton/Higher Grappenhall, and where there is still much under-developed land on the north side of the railway. The counter-argument that south of Birchwood station is designated Green Belt is invalid, as Stretton and Higher Grappenhall are Green Belt too. Birchwood also already possesses a major shopping centre and bus services.

Under "Bus Travel", para. 2.2.6, the report admits:

- a change of bus is often required for cross-town journeys, as there are few through routes

- in contrast to the unsubstantiated faith being exhibited elsewhere in relation to the future residents of the proposed new communities at High Walton, Grappenhall and Lymm being willing to use buses for travel, there has been a reduction in bus users from 11.5 million passengers per annum to 6.6mppa between 2010-11 and 2015-16 (five years), and that this decline is above the NW average.

(Question: if bus use has declined so steeply, with buses visibly emptier, why does WBC think the much of the answer to the Garden Suburb's future transport needs are likely to be provided by buses? Why would the Garden Suburb's residents buck the Warrington trend?)

- The majority of services finish at 2300, and there are limited Sunday services

(Question: where is WBC going to find the funds to commence indefinitely supporting lossmaking evening and Sunday bus services to/from the Garden Suburb?)

- Bus fares have risen in recent years, making taxis more competitive (but these add to traffic congestion)
- There has been a drop of 48% in "local bus spend" (presumably, local-authority bus subsidy) between 2009-10 and 2014-15 (again, five years)

(see question above)

- Congestion in the town is admitted to be causing decline in the quality of bus services (para 2.2.7). Implementing bus priority measures is seen as one means to raise quality.

Question: if implementing bus priority measures is seen as the way forward, why is so little progress currently being made with it? And how would bus priorities be implemented through the peak-period congestion in, eg, Stockton Heath High Street, or Latchford? And bus priority measures will be unable to deal with Manchester Ship Canal bridge swings, which occur several times every day and which seem set to increase in frequency due to the need to make better use of the Ship Canal for wider environmental reasons.

- Employment centres at Gemini, Omega, SciTech Daresbury, Lingley Mere, Birchwood considered to have poor public transport accessibility.

Question: how will the Council be able to afford new subsidies for additional lossmaking peak-period commuter bus services between these locations and proposed new settlements in South Warrington?

-Under "Active Travel":

- Cycling is below the national average, but increased 21% between 2006-15
- The town centre is considered "impermeable"
- Walking (distance undefined) three or more times per week is below the national average
- Inconsistent infrastructure across the town

- Concerns over safety. Warrington town centre identified as an accident hotspot

Question: how is the acknowledged impermeability of the town centre to cyclists going to be overcome? Are cyclists and pedestrians going to be given priority the length of Wilderspool Causeway and Knutsford Road, and through Brian Bevan roundabout and the Bridgefoot gyratory?

Under "Freight":

- Percentage of LGVs increasing, up from 10.3% in 2000 to 14.0% in 2015
- Swing bridge movements decreased (not stated by how much) 2013-17

Question: in the light of the MSC's intention to maximise use of the Canal (bringing major environmental benefits in terms of reducing trans-regional HGV movements), how is any increase in bridge openings going to be dealt with in terms of traffic congestion? (see comments about Cantiever Bridge replacement)

Under "Future Growth" (these were the figures in the original evidence base report):

- Plans for 24,200 houses and 381ha of employment land over next 20 years
- Within existing Urban Area and Warrington Waterfront, plans for 15,000 new homes and 129ha of employment land
- Within Green Belt, Garden City Suburb, 6,300 new homes and 117ha employment land
- Within Green Belt SW Extension, 1,800 new homes
- Within Green Belt outlying settlements, 1,190 new homes

(these figures have subsequently been altered to those in the revised Local Plan)

The evidence base document admits that "A transport package of new distributer (sic) road, walking and cycling network and public transport linkages will be required to support the mass movement of people from the Garden City Suburb".

Question: where is the funding for these coming from?

It also admits that "There may be increased demand to reach important employment destinations identified within the Atlantic Gateway and Cheshire Science Corridor (including) Birchwood Park, Warrington Waterfront, Omega, Lingley Mere and SciTech Daresbury."

Question: has the AECOM transport model taken all of these sought-after developments into account in its congestion projections?

"Warrington could also create an Integrated Rail Hub between Northern Powerhouse Rail and HS2 at Bank Quay. NPR would see a new line between Liverpool, Warrington, HS2 and Manchester Airport and beyond".

Question: how have the road-traffic-generative effects of an HS2/Northern Powerhouse Rail "hub" at Bank Quay, however desirable in itself, been taken account of in the AECOM traffic modelling?

Under "Environment and Wellbeing", the evidence base report notes that:

- In 2006 (aren't there any more recent figures?), road transport in Warrington contributed 37% to Warrington's CO2 emissions.
- National standards for NOx are being exceeded on the surrounding motorways and in the town centre and the roads leading to the town centre.
- The Warrington Air Quality Action Plan states that a 43% reduction is required (of NOx) on local motorways and a 41% reduction in the town's Air Quality Management Area. Within the AQMA, petrol cars contribute 11% of NOx and diesel cars 50%. HGVs and LGVs contribute 20% and buses contribute 11%.

Question: how is a massive residential development in South Warrington going to help secure a 41% reduction of NOx within the Town Centre Air Quality Management Area?

For noise, "top priority" areas include:

- A56 Chester Road near Higher Walton
- Knutsford Road near Latchford

"Important" areas include:

- Wilson Patten Street
- Mersey Street
- Knutsford Road
- A50 Kingsway Street (Latchford)

Question: how will massive residential developments in Walton, Stretton, Higher Grappenhall and Lymm contribute to reducing traffic noise in the above six locations?

Sensitivity Testing of Alternative Scenarios re Traffic and Travel

This looks at the AECOM document Preferred Development Option, *Transport Model Testing of Alternative Scenarios*, published in June 2018.

The document looked at the Preferred Development Option (PDO) and other scenarios (numbered 2 to 7), and the viability of each in terms of containing increases in (eg) average trip length. It is immediately apparent from the results that the Preferred Development Option does not come out best, in most cases.

- For vehicle hours, Scenario 3 is the best performer.

- For vehicle kilometres (overall distance travelled as consequences of changes in trip length), Scenario 3 (see later) is the best perfomer.
- For average trip length, all trips, the PDO is the best performer.
- For average trip length for new trips, Scenario 7 is the best performer.
- For public transport modal share, Scenario 7 is the best performer.
- For average speed, there is negligible variation.
- For the Ship Canal screenline (key pinch points) Scenarios 3 and 7 have the lowest vehicle flows.
- For the Ship Canal screenline for bus passengers, Scenario 2 performs the best.
- For the inner cordon flows of vehicles, Scenario 3 has the lowest flow.
- For the inner cordon for bus passenger flows, the PDO has the highest flows.
- For cross-town route journey times (4 routes), Scenario 3 has the lowest journey times.

Generally, differences were admittedly described as marginal.

For the key Ship Canal screenline, daily two-way flows:

- the PDO has 82,907 vehicles
- Scenario 3 has 80,404 (3% lower than the PDO)
- Scenario 7 has 80,365 (again, 3% lower than the PDO)

Note:

- The PDO assumes 6,324 dwellings in the Garden City Suburb (GCS) and 1,831 in South West Warrington.
- Scenario 3 assumes only 3,198 dwellings in the GCS and 902 in SW Warrington.
- Scenario 7 assumes only 2,293 dwellings in the GCS and 647 in SW Warrington.

Port Warrington

(These notes are from *Warrington Waterfront: Port Warrington, Warrington Commercial Park and Moore Nature Reserve & Country Park*, published by Peel)

The Port Warrington development, on the north bank of the MSC immediately west of the WCML overbridges, and stretching north towards the Rover Mersey, is of particular relevance to the Local Plan because:

- The Port Warrington proposal includes a container handling area, the potential for a rail freight connection, warehousing for manufacturing, distribution and storage, and a possible turning basin for ships

- It is likely to generate a growth in local HGV movements

(Question: how will these HGV movements be accommodated on the local road network other than the Western Link? How have these movements been modelled by AECOM? Have they been modelled at all?)

- It (Port Warrington) would theoretically be able to function without involving additional swing bridge movements (this would depend on the construction of a ship "swinging ground" facility, so that they could turn back towards Liverpool)

- It could be the catalyst for a further development (Warrington Commercial Park), brining additional employment but also generating additional commuter car traffic

(Question: how have car movements and LGV/HGV movements in relation to Warrington Commercial Park, other than via the Western Link, been modelled? Have they been modelled at all?)

- Its traffic implications are likely to involve the proposed Western Link, as the latter runs immediately east of the site

(Question: what are the implications for traffic congestion on the Western Link of the Port Warrington and Warrington Commercial Park developments, however desirable these developments are in other ways? Have, for example, the Port Warrington HGV movements, the Warrington Commercial Park LGV and car movements, and the additional Walton residential movements from 1,600 extra dwellings, all been modelled in combination?)

The Port Warrington site is diametrically opposite (across the Canal) from the proposed South West Urban Extension (of housing) at Walton.

The Port Warrington proposal would be part of a chain of ports running from Liverpool/Birkenhead in the west, via Port Sunlight, Ellesmere Port Docks, Port Ince, Port Runcorn, Port Warrington and eastwards to Port Salford.

The document states: "It is anticipated that Port Warrington would attract businesses that would benefit from a port-side location."

The Peel documentation states that "in the longer term there is the opportunity to connect the Ship Canal to the rail network as well as the strategic road network, providing a truly multi-modal facility."

Under “Wider Warrington Waterfront Ambition”, for “Movement” the document aspires to:

- Reducing the use of the private car and promoting public transport, walking and cycling
- Additional bus stops within walkable distance alongside the existing bus and train routes
- Pedestrian and cycle links between the waterfront developments, the Country Park, and residential areas and community facilities

Question: is it assumed that there will be a pedestrian and a cycle route along the route of the Western Link? Is it likely that pedestrians and cyclists wishing to, for instance, reach jobs at the Warrington Commercial Park from new houses in Walton, would want to use a highly-elevated road that will be very exposed and extremely unattractive in poor weather, winds, and hours of darkness?

- The delivery of the new link road (Western Link) will reduce traffic congestion and provide the infrastructure required for the expansion of Warrington town centre

Question: how could the Western Link significantly improve traffic conditions in the town centre, when it will do little or nothing to relieve the A49 (south), A50 (south-east) and A57 (both east and west) corridors?

The Warrington Commercial Park would be at the extreme eastern end of the Moore Nature Reserve and Country Park, up against the proposed Western Link where it passes under the WCML.

WBC has stated that Port Warrington will “become one of the most important employment areas in the North West Region.”

Question: if the above is true, what are the traffic implications (in the context of the 5,000-6,000 additional homes in Higher Grappenhall, the 1,600 additional homes in Walton and the 430 additional homes in Lymm) for the A49 and A50? Again, have the implications in combination been tested?

The whole site (Port Warrington, Warrington Commercial Park and Moore Nature Reserve) lies within the Green Belt. The justification for release is based upon its multi-modal role and economic benefits. In particular, Port Warrington would reduce HGV movements (by switching inland freight from the Mersey Ports to the MSC).

It is not clear from the report how HGV traffic would access the Port Warrington facility, but is seems possible that at least some traffic might reach Port Warrington from the M56 via the A49/A56, or from the M6 J20 via Grappenhall and Stockton Heath. This clearly needs to be considered as part of an overall route strategy for HGVs in Warrington.

Question: what evidence is there that HGV traffic to Port Warrington would not use local roads on the south side of Warrington? (other than the A56 from the M56 at the Lord Daresbury).

Emissions

The Cities Outlook 2019 report published by the Centre for Cities in February reported that the worst 10 cities, out of 63, with the highest emissions per capita (worst at bottom) were:

	CO2 emissions per capita 2016 (t)	CO2 emissions per capita 2015 (t)
1 Ipswich (best)	3.1	3.4
54 Stoke		
55 Barnsley		
56 Preston		
57 Aberdeen		
58 Wakefield		
59 Warrington	6.7	6.9
60 Doncaster		
61 Newport		
62 Middlesbrough		
63 Swansea (worst)	21.6	24.3
UK average	5.4	5.9

Question: how does the provision of nearly 19,000 new homes, in the context of an unfunded and not fully thought-through Transport Plan that has many uncertainties and contradictions, improve emissions in a town that is already 59th out of 63?

Warrington Fourth Local Transport Plan Consultation Draft, March 2019, WBC

The draft notes that WBC has a statutory duty under the Transport Act 2000 and the Local Transport Act 2008 to produce an LTP and to keep the Plan under review. The LTP is not assessed by, or reported onto, Central Government.

The previous Plan was the April 2011 Plan.

Our comments On LTP4, insofar as they relate to the major urban developments on the south side of Warrington:

The introduction claims that “The proposals for significantly increasing the use of sustainable travel modes are supported by a programme of major transport infrastructure improvements” (including the Western Link). However, there is very little evidence indeed of such a programme in the document.

The document refers to several Transport for the North initiatives that will impact on Warrington overall, including:

- HS2 Phases 1, 2A and 2B
- Northern Powerhouse Rail (HS3)
- Integrated rail hub at Warrington Bank Quay
- CLC (Liverpool-Warrington Central-Manchester) line capacity and service improvements (unspecified)
- Electronic all-modes public transport ticketing
- Trunk Road investment strategy, including M6 J22-J25 and "Smart" motorways
- M6 J19-J21A improvements
- Warrington Western Link
- M56 J11-J15 capacity improvements
- What is described as the "Warrington New City Transport Improvements Package" (again, unspecified)

The Cheshire and Warrington Local Enterprise Partnership's Strategic Economic Plan (SEP) states that economic growth should be targeted on:

- Cheshire Science Corridor
- Mersey-Dee Economic Axis
- Constellation Partnership (don't know what this is)
- Warrington New City

The LEP's SEP identifies the key challenges for the transport network in Cheshire and Warrington as being:

- Accommodating development growth (particularly relevant)
- Congestion on strategic routes (ditto)
- Sub-regional movement
- Cross-boundary movement
- Rural connectivity
- Dominance of the car for modal share (again, particularly relevant)
- Low bus use (Warrington's decline has until recently been exceptionally severe)
- Modernising local rail services (new stock arriving, but no plans for electrifying Liverpool-Warrington-Central-Manchester, or Warrington-Chester)
- Increasing the levels of cycling and walking

This is against the background of the 2015 High Court challenge to WBC, which overturned the housing target for 2006-27 of 10,500 new homes, or 500 per year.

LTP4 states (p21) that: "New development will be successfully integrated into Warrington's transformed public transport system" (our emphasis).

It also claims that: "The enhanced Green Space and Waterways network…..will provide high quality walking and cycling routes that promote active lifestyles, reduce carbon emissions and contribute to improving air quality."

Question: is there any indication of funding being available for a "transformed" public transport network? And is sufficient funding likely to become available to create a comprehensive network of cycling and walking links across South Warrington, and between South Warrington and Warrington Town Centre and its rail stations?

The Warrington Health and Wellbeing Strategy states (amongst other aspirations) that "there will be a sustained focus on addressing lifestyle risk factors and protecting health."

LTP4 states that there will be a Local Cycling and Walking Infrastructure Plan, as a "daughter document" of LTP4.

Question: when is this Infrastructure Plan likely to appear, and more importantly, when is the actual infrastructure programmed to appear on the ground to any significant extent?

LTP4 also states that a new Public Transport Strategy will be developed within LTP4, aimed at making public transport a more attractive choice. However, there has been little evidence of recent progress on this, other than a new bus interchange a decade ago.

Question: why "will" be developed? Why is it not already in LTP4? Isn't that meant to be the whole point of LTP4? If the additional housing is imminent, surely the Public Transport Strategy could have been developed by now? The document is not in itself dependent on massively-increased housing.

Warrington's car ownership is 81% (national average is 74%).

For journeys to work, in 2011, modal share was as follows:

- Car or van 73.9%
- On foot 7.7%
- Passenger in car or van 6.2% (combined total of car/van driver/passenger 81.1%, extremely high for an urban area)
- Bus, minibus, coach 5.4% (this is extremely poor for an urban area)
- Cycle 2.3% (below average)
- Train 2.3%
- Everything else less than 1% (each)

Total car traffic on major roads in Warrington reached its highest-ever level in 2016, at over 1 billion vehicle miles.

LTP4 states that "The challenge is to develop a strategy which reduces the reliance on car travel, and in tandem enhances the competitiveness and attractiveness of public transport and active travel."

Question: why is the challenge only from now on to develop a strategy? For instance, bus use has plummeted 40% in six years. Has this come as a surprise? The bus network radiates from the town centre, yet the Council has acceded to retailing moving out to Gemini and the

Winwick Road. Surely, the consequential loss of town centre activity, and the resulting depressant effect on the bus network, has been easily foreseeable?

"Public funding for socially-necessary bus services has dramatically reduced during the LTP3 period as a consequence of austerity."

Question: is it being assumed that the very steep reduction in public spending on supporting bus services is likely to be reversed? There is no evidence of this to date. Indeed, even the remaining limited public financial support for loss-making local bus services may prove very difficult to retain in the light of wider spending pressures on Councils.

Use of the local rail stations (Warrington Bank Quay, Warrington Central, Sankey, Padgate, Birchwood and Glazebrook, which is on the Warrington/Salford boundary) has increased 2004-05 to 2017-18 from 2.0m to 4.2m (this should increase further with the welcome opening of Warrington West in 2019).

Comments from LTP4 consultation:

- "The highways network is already over capacity
- Roads are already very busy
- Cars are destroying our town
- The roads can't cope with the current volume of traffic
- The current bus system is very limited and infrequent
- Buses are not timely enough and they cost more to use than a car
- Getting around by bike is a nightmare, cycle lanes just stop dead at the very places cyclists need protection from cars and trucks
- Cycling is so dangerous with the roads being so overcrowded with lots of pinchpoints"

LTP4 consultation specifically (in relation to congestion) mentioned Stockton Heath, Knutsford Road, Thelwall, Grappenhall, the A50, Chester Road, the A49 and Lymm

The priorities during consultation, for public transport and active travel, were considered to be:

- A modern high quality public transport offer
- Putting sustainable transport at the heart of development
- Protecting corridors for HS2 and NPR/HS3
- Improving active-travel links to the town centre
- Promotion of active lifestyles
- Increasing cycling infrastructure

Stakeholder views during LTP4 consultation included:

(highways management)

- Mixed views about increasing road capacity
- Need to route HGVs away from the A49 and A56

(buses and rail)

- Better evening services, improved routeing, better bus/rail integration, improved marketing

Question: is the Council anticipating increased funding for evening bus services? The proposed new low-density developments at Stretton, Higher Grappenhall and Walton are likely to require indefinite public subsidy for evening and Sunday services, if there is to be any realistic hope of buses obtaining and maintaining more than a tiny overall modal share of trips.

- Better services from small stations

(new modes)

- Guided buses/bus rapid transit and trams suggested

Question: why has there not been any significant recent /current progress on bus priorities, or examination of guided busways? The nearby Leigh guided busway was in planning fully a decade ago.

- Demand-responsive transit should be considered

(funding)

- Workplace parking levy (as per Nottingham)

Question: has there been any previous consideration on having a Workplace Parking Levy? The idea is not new, and yet seems to have only just been offered as a future possibility for Warrington.

- Council Tax precept ring-fenced for public transport

Question: does the Council have powers to do this? If not, it may be a non-starter. If it has, surely it should have already started? (NB - the game-changing "Versement Transport" in France was introduced as long ago as 1973 in the provinces, and in 1971 in Paris).

- Public health funding to improve air quality

Question: is this even remotely realistic, given the NHS's funding crisis?

- Increased Central Government funding
- Parking revenues and traffic-offence fines to go to public transport

(see Versement Transport comment earlier)

(for active travel)

- Active travel routes alongside new passenger transport corridors
- Improved surfaces for cycle paths
- Installation of cycle priorities at difficult junctions

(Comment: It is the most difficult junctions/sections of road that need addressing the most urgently. There has been little sign of this to date.)

(policy)

- Active travel should be at top of agenda, rather than fitted around an environment of driving
- Sustainable travel should be more embedded into developments
- Town centre should accommodate various transport modes
- Clean-air areas should be considered
- Improved road safety should be part of maintenance schemes
- Vegetation should not be allowed to block walking routes (this is the bane of my life)

The threats to Warrington, from carrying on with "business as usual", are:

- Becomes further dominated by private-car travel

Question: how is this going to be avoided in the development of, eg, 6,000 houses in Walton, Stretton and Higher Grappenhall? Without major prior investment in sustainable alternatives, the car will be dominant, and probably even more dominant, in this area, given its distance from the town centre and its hilly nature.

- Increased social exclusion
- Public transport becomes less viable, network shrinks

(see earlier comments about buses)

- Obesity rates increase
- Increased emissions, adverse health impact of poor air quality
- Increased noise from traffic
- Warrington becomes less attractive to work in and visit
- Workplaces become increasingly inaccessible
- Worsening of natural and built-up environment

Question: re the last-mentioned, how does building thousands of houses on Green Belt land avoid actually further worsening the natural environment in these areas?

Key strategic transport priorities are:

- Improved safety, health and wellbeing
- Improved air quality, reduced noise

- Reduced emissions

(see notes/comments earlier)

- Transport improvements to support housing growth and development
- Support creation/retention of jobs

Vision statement:

- "Warrington will be a thriving, attractive and well-connected place with popular high-quality walking, cycling and public transport networks"

Question: for a modest-sized town, how does the Council anticipate mobilising the major investment needed to achieve this, particularly in the light of the car-dominated policies that date right back to the formation of the New Town, and the prolonged historic failure to implement comprehensive continuous bus, cycle and walking networks.

Under Section 5.3, "A Thriving and Attractive Place", it states:

- A less car-dependent culture will lead to a town centre that is less car-dominated
- For the town centre "improved air quality and less traffic will contribute to a more pleasant town centre environment (p42)
- For suburban Warrington, "Residents will benefit from improved air quality, less traffic and improved access to the town centre" (p42)
- (Residents) "will be able to move around more easily using a frequent, convenient, reliable public transport network and attractive walking and cycling routes" (p43)
- "New housing developments…….will have convenient access to the town centre and other key destinations using high quality public transport and there will be good, attractive walking and cycling facilities"

Question, once again, how does the Council anticipate securing adequate funding for stable high quality public transport and walking/cycling networks? Their collective cost, from a near-standing start, will be very considerable. Even stemming the ongoing decline in bus use will prove challenging.

- "The thriving large employment areas outside of the town centre…….will be accessible from the rail network and served by a high-quality public transport offer, and will be easily and safely reached by people walking and cycling……"

Question: once again, how will this be achieved? The ability of the rail network to provide convenient access is very limited, although the provision of bus/rail links at Bank Quay is a recent welcome step. However, even there, the buses serving the station are often delayed by general traffic congestion, eg queueing outbound on Sankey Street before turning left towards Bank Quay.

On the workplace parking levy (WPL) proposal:

- “Across the Borough, the improvements to both our passenger transport services and walking and cycling networks will be supported by a Workplace Parking Levy that will also support a reduction in car dependency.”

Question: the WPL is very welcome, but what evidence is there that the public will accept it? There are also potential ragged edges to the proposal. How far out will it extend? Will it include, eg, Woolston Grange industrial estate, or Birchwood Science Park?

Under section 5.4, Changing How We Travel (p44 of the LTP), it states that:

- “Our aspiration is to reduce journey to work mode share for drivers of cars/vans to 60% by the first census (2041) that will take place after the end of the LTP/Local Plan period in 2037.”

This involves:

- Increasing cycling by 2.5 times
- Increasing bus and local public transport use by 3 times

Question: given the very recent 40% slump in use, is this even remotely realistic?

Further question: someone will have to pay for, eg, newer/greener buses, additional evening services, new links to new developments, etc. Is the bus passenger market robust-enough to sustain this financially through fares that are already widely perceived as high?

- Increases in walking, from 7.7% of trips to 9.5% of trips

To deliver its vision, LTP4 plans (p46):

- A Local Cycling and Walking Infrastructure Plan (LCWIP)
- This will be made up of Primary routes, Neighbourhood routes and Greenways
- A Mass Transit Network (p47), akin to either Bus Rapid transit (like the Leigh Guided Busway) or Nottingham Express Transit (tram system)

For the mass transit system, there would be three cross-town-centre routes and two orbital routes:

- (cross-town) Lingley Mere/Omega in the NW to the proposed Garden Suburb
- (cross-town) Daresbury in the SW to Winwick in the north
- (cross-town) Birchwood in the east to Fiddler’s Ferry in the west
- (orbital) Birchwood to Garden Suburb
- (orbital) Lingley Mere/Omega to Birchwood via Longford and Orford

Question: how much work has been done on this proposal? The viability of even a half-hourly all-day ordinary bus route, with significant junction priorities, on the two orbital routes must be open to question.

The town centre (three routes) routeing would serve Warrington Central/bus interchange and Bank Quay (where it would meet HS2 services and Northern Powerhouse Rail/HS3)

LTP4 states that:

- This early work confirms that a mass transit system could be commercially viable"

Question: this is questionable in the extreme, and the Council should make public its calculations that form the basis of this claim.

- The concept of developing a mass transit system……is at a very early stage
- A large amount of optioneering, feasibility and design work is required before we are able to confirm routes or identify corridors that the services may run on
- The Council proposes to carry out this work in the first 5 years of LTP4

Question: how will carrying out this work over the next five years be able to meet the needs of residents of new housing that in some cases will actually be in place by then? We do not want a repeat of what happened at Birchwood station in the late 1970s, where new housing went in, and many residents bought cars, whilst the New Town and British Rail wrangled about funding the proposed new rail station, with the station going in several years later. The infrastructure and services need to go in from Day One, not years after the estates have been started and car-based travel patterns established.

The LTP4 document also seeks a "super-hub" for HS2 and NPR/HS3 rail services at Bank Quay, but is silent on the implications that this would have on the local highway network.

It claims that the "super-hub" would serve the populations of the West Cheshire and North Wales areas, and that "over a million people from the Mersey-Dee area would have better, more logical access to the Northern Powerhouse Rail network if Warrington comes forward as an NPR hub".

Question: in detail, what are the road traffic projections that would be associated with creating an HS2/NPR super-hub, however very desirable, at Bank Quay? The access to the area is constrained by the MSC, the River Mersey and the WCML itself. Highway congestion could be expected, particularly if the super-hub is to serve a million-plus catchment, as is claimed. There is no mention of this in the AECOM work.

For rail, LTP4 states:

- WBC have been working with TfGM and Merseytravel to identify options for enhanced service patterns on the CLC line
- Seeking a connection into Merseyrail via Liverpool South Parkway, which is feasible if the CLC line is electrified (there is a reference to the Liverpool-Birchwood service. No

such service currently exists, per se). The LTP4 proposal to turn trains from the west back at Birchwood is a non-starter, and almost certainly would be strongly resisted by train operators and Network Rail)
- WBC seeks the establishment of a "Warrington Metro" with six trains per hour on the core section between Warrington West and Birchwood (as above). Again., this seems near-impossible, as reversing trains either at Sankey or Warrington West or at Birchwood would impair the CLC's already-stretched line capacity

The Workplace Parking Levy (p53) is predicted at £400pa per space (as per Nottingham, at £402). However, LTP4 admits that "a significant amount of work is required" before a WPL can be introduced, covering:

- The geographical extent of any scheme
- Categorisation of parking spaces (not sure exactly what this referes to, exemptions perhaps?)
- Eligible sites and companies
- Level of charge per space

It is anticipated that Section 106 contributions from new developments could supplement the WPL (p54).

Question: what degree of benefits are realistically anticipated from developers in Walton, Stretton, Higher Grappenhall and Lymm? The Council and the community would need a great deal more than the odd free roundabout. Based on actual past experience in Warrington, and current experience elsewhere in England, how much funding, eg for seed-corn for bus services, is realistically anticipated?

Priority Transport Infrastructure

Minor improvements:

- Pedestrian and cycling accessibility improvements
- Road safety/traffic management schemes
- Junction upgrades (don't these usually make life more difficult for cyclists and pedestrians?)
- Bus stop improvements and small-scale priority measures
- Highway maintenance (does this include vegetation cutting-back to help pedestrians? And cutting back trees that obscure road signs?)

Major Improvements:

(only the South Side and Town Centre schemes planned/programmed are listed below)

- Centre Park Link, new bridge over the River Mersey and junction improvement at Slutchers Lane/Wilson Patten Street, start on site Spring 2019, value £19.9m

- Warrington Western Link, including new bridge over MSC and link road (reported as costing £212m)
- Warrington South Strategic Infrastructure Phase 1 (Garden Suburb Strategic Link)

Question: exactly what sort of traffic is anticipated to use the Garden Suburb Strategic Link? Is it to be weight-limited, to keep HGVs off it, or is it actually aimed at HGVs? Will all roads in the Garden Suburb be speed-limited to 20mph? How would that be enforced, as it certainly isn't being enforced elsewhere, eg Wash Lane, Cantilever Bridge. The 30mph limit is very also widely abused, by general traffic (not necessarily HGVs).

Further Set of Major Transformational Schemes (p57):

- Go Dutch cycling strategy (strategic corridors, neighbourhood links and greenways, at concept stage)
- Mass Transit (at "indicative concept" stage)
- Last Mile Project (major package of junction improvements, rail station enhancements and access measures to support town centre growth

Question: how are these "concept stage" schemes to be weighed-up, in terms of curbing additional traffic growth from new settlements, when no detail of them is yet available? How are they to be funded? What prospects are there for successfully obtaining funding, given that there are many times more local authority funding applications to Government than there are funds available.

Question: re town centre growth, has the AECOM model assessed likely additional traffic flows in the light of additional parking in the town centre being provided?

Under Table 6.3, p57, there is "a further set of schemes that may be required in the future." These include:

- Warrington Band Quay "Gateway Station" transport improvements (it is not clear what these are)
- High Level Cantilever Bridge Crossing

Question: again, what Cantilever weight limit is envisaged? What access roads are envisaged?

Question: in the event of a mass transit network being agreed, should any replacement Cantilever Bridge be reserved for public transport/mass transit and emergency vehicles only, to give public transport a competitive advantage?

- A49 Corridor Improvements (unspecified)

Question: what improvements are planned for the A49 corridor? If no details are yet available, for this and other similar schemes, isn't sanctioning many thousands of new houses premature? (cart before horse).)

- Bridgefoot Link and Brian Bevan Island (unspecified)
- Southern Gateway Development Access Framework

(repeat of above question)

The document says that these are all “at concept stage”. Further feasibility and design work “will be undertaken in the first five years.”

Question: how can WBC guarantee that any serious degree of feasibility and design work actually take place within the next five years, given local government finances? Also, feasibility studies aren’t the same as “implementation of schemes”. They are only paper, however necessary and well-intentioned.

On pp57-58, it is admitted that the town centre:

- Has a very car dominated urban environment
- There are limited crossing-points for pedestrians
- It is a very unpleasant environment for cyclists
- Bus services are severely affected
- There are few bus priorities

Comment: these problems have been partly created by former Cheshire CC and WBC schemes, and there has been only very limited efforts to reverse them.

LTP4 Part B Policies Section

There are many sensible and laudable policies. But no guarantees that the very considerable amounts of money will be there to implement them.

On p78, it notes that Warrington is suitable for cycling, as it is flat. But the Stretton and Higher Grappenhall area is significantly hilly, which will deter many “marginal” potential cyclists.

Innovative ideas such as a car-sharing club are floated. But no progress is currently being made with this (as far as we are aware) this past decade. Indeed, Warrington has lagged behind in its thinking compared with best practice elsewhere.

The Council claims that “We will work with all the bus operators in Warrington to help to positively market their services…..”.

Timetables are certainly currently available. But present performance about “working with all the bus operators” is far from encouraging. For example:

- there are still bus stop flags up for long-withdrawn routes, eg the 10C
- there are bus stop flags missing at active stops; these have been missing for years
- no attempt has been made to fill-in bus bays that delay buses rejoining fast-moving traffic, as has been done elsewhere in the UK

- numerous shelters and stop flags have been vandalised and not repaired for years due to lack of funds. At-stop printed information is often poor or non-existent.
- the so-called real time information system is not “real time” and still shows withdrawn services as imminently due
- as an example of ticketing shortcomings, there is no annual offpeak ticket for retired men/women who do not yet qualify for a senior buspass
- boarding times are very slow compared with operations elsewhere in the UK
- the passenger liaison committee (comprising bus users) was apparently abolished some years ago

On pp90-91, the LTP4 sets out Smarter Travel Choices interventions, all earmarked as the next 0-5 years:

- bespoke Town Centre Travel Plan
- Investigate Town Centre car club
- Investigate bike sharing scheme
- Continue to deliver Sustainable Modes of Travel to School strategy (SMOTS)
- Indentify funding sources for child cycle training
- Raise awareness of new sustainable travel infrastructure
- Identify funding sources for adult cycle training
- Work with bus/rail operators to help identify service improvements/promote ditto
- Promote active travel
- Develop education/training that support safer travel
- Identify requirements for a programme of promotional campaigns for sustainable travel
- identify/remove barriers that travel creates for jobseekers

For buses (p94, LTP4 notes:

- Bus use fell from 10.8mppa in 2011-12 to under 7mppa then rising to 6.8mppa in 2017-18
- It is significant that bus use in Warrington has declined much more steeply than that in Cheshire East, Cheshire West & Chester, and Halton

LTP4 states (p95) that “We will work with partners to review the core strategic bus network to link residential areas of the Borough with employment sites and key local services.” However, it is silent on how it intends to resource this policy financially.

Question: is this occurring yet? These many initiatives will require significant staffing at the Council. Our suspicion is that it is not, probably due to recent staffing cuts in the WBC transport planning function.

The LTP4 document is also silent (pp96-97) on how it intends to resource other public-transport-supportive policies.

Policy PT11 (p98) states that “We will identify options and delivery mechanisms for a mass transit system.” Again, there is no commitment to creating one, nor any indication as to how it might be financed.

Question: why is the examination of the possibility of a transit system not being urgently investigated already?

Policy PT12 states (p101): “We will continue to lobby for improvements to the national rail network that are positive for Warrington.”

But, from May 2018, Warrington lost its important direct TransPennine services to Huddersfield, Leeds, York and Scarborough. This suggests a lack of effectiveness and influence in this policy area.

Question: apart from supporting the concept of Northern Powerhouse Rail (but controversially opposing the HS2 bypass of Warrington Bank Quay), what service improvements are currently being lobbied for? This does not have to await the new housing developments.

LTP4 also states (p101): Electrification of rail lines through Warrington may (surely, will?) facilitate improvements to services. Where this is the case, we will support the rail industry to progress any proposals for electrification.”

The reality is that:

- There are no proposals (nationally) to electrify Liverpool-Warrington-Manchester (Warrington was missed out under the Lancashire Triangle proposals, and lost out to the Chat Moss route)
- There indeed is no present national electrification programme at all. The Kettering-Sheffield and Oxenholme-Windermere schemes were recently cancelled by the Secretary of State.

Question: what actually is meant by “we will support”? These seem empty words. There seems no prospect of WBC contributing to the costs of any rail electrification scheme.

According to LTP4, Sankey. Padgate and Glazebrook stations are considered by users to be poor. Yet there are no proposals for improvements at these stations, although Sankey will be replaced by the new (and much better-appointed) Warrington West, part-funded by WBC.

There is a wholly unconvincing diagram on p103 suggesting stopping trains from Manchester turning-back at Penketh and stopping trains from the west turning-back at Birchwood. As already commented upon, these proposals would require:

- Expensive crossovers at both Sankey and Birchwood (there are none at present)
- Expensive turnback sidings (ideally located centrally between eastbound and westbound tracks)
- Expensive re-signalling to accommodate the above

- Worst of all, the loss of a large amount of capacity on the route, due to the need to perform no fewer than four reversals of trains every hour on a route that is already very busy

It is almost inevitable that any such proposal would be rejected by Network Rail and train operators, even if WBC was prepared to underwrite the significant costs, which it would find unaffordable.

Question: what preliminary discussions with Network Rail, Transport for the North and train operators have taken place on this specific proposal?

Accidents and Safety

In the years between the start of 2008 and the end of 2017 (the most recent year available), there have been 39 fatal casualties, 789 serious casualties and 5,511 slight casualties on Warrington's roads.

These comprise, by mode:

- 42.2% car occupants
- 13.3% pedal cyclists
- 11.4% pedestrians
- 11.3% motorcyclists
- 2.5% goods vehicle occupants
- 2.3% public service vehicle (bus/coach) occupants

Averaged for the years 2006 to 2015, nationally, for every billion passenger-kilometres travelled there were the following fatalities (rounded to the nearest one person):

Bus/coach occupants.....Nil
Train passengers.....Nil
Air passengers.....Nil
Van occupants.....Nil
Water.....1
Car occupants.....2
Pedal cyclists.....24
Pedestrians.....26
Motorcyclists.....83

(source: Transport Statistics Great Britain, 2017 Edition, Department for Transport)

The above paradoxically suggests that, because of differing casualty rates on different modes, encouraging walking and cycling could actually increase fatalities. This underlines the critical need for policies to be backed by comprehensive action on the ground. For example, any desire to increase walking and cycling must be preceded by major investment in safe networks for those modes, to create continuous linear safe routes. This means that the development and management of transport infrastructure across Warrington, particularly for

radial routes, routes to schools, and routes into and across the Town Centre core, and the need to greatly improve the value of the bus network, must be fundamentally re-thought and revised. There is little evidence that any of this is yet in place.

Conclusion

For these reasons, set out comprehensively above in this Appendix, we believe that the Local Transport Plan 4, however well-intentioned, is only at the dawn of delivery, a delivery that will take at least two decades.

In turn, we therefore believe that the Local Plan housing proposals for South Warrington are fundamentally unsound.

Introduction

Air quality is a material consideration in planning terms. The NPPF says the planning system should contribute to enhance the natural and local environment by preventing new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, unacceptable air pollution. However, the consequences of the LDP will inevitably drive air quality down even further for the entire population of Warrington. Today, the quality of the air Warrington residents breathe is at an unacceptable level and implementing the plan will make it worse.

Context

The weight of evidence on the effects of air pollution is growing rapidly. There are many types of air pollutants:NO2, NOx and two measures of small particulates PM10 and PM2.5. The most dangerous of these to human health is PM 2.5. Since they are so small and light, fine particles tend to stay longer in the air than heavier particles. This increases the chances of humans and animals inhaling them into the bodies. Owing to their minute size, particles smaller than 2.5 micrometers are able to bypass the nose and throat and penetrate deep into the lungs and some may even enter the circulatory system.

Studies have found a close link between exposure to fine particles and premature death from heart and lung disease. Fine particles are also known to trigger or worsen chronic disease such as asthma, heart attack, bronchitis and other respiratory problems.

A highly credible study carried out by researchers from Utrecht University in the Netherlands and various other European institutions and funded by the European Community's Seventh Framework Programme concluded that 'air pollution may be damaging every organ in the body and virtually every cell in the human body'. The study carried out in 22 countries on a population of 376, 521 people, was published in the peer-reviewed medical journal The Lancet.

The study found no association between mortality and average annual concentrations of PM10, NO2 and NOx or traffic intensity on nearest roads and major roads. However, they did find a 7% increase in mortality with each 5 micrograms per cubic metre increase in PM2.5 (particulate matter with a diameter of 2.5 micro-metres) concentration. This link remained even after taking into account various socioeconomic, health and lifestyle factors. The findings are reported to be similar to those of a recent pooling of studies looking at the effect of PM2.5 on death from any cause.

The researchers note that when comparing the cohorts, they found that the variation in PM2.5 concentration was not solely related to traffic variables, but also seemed to vary according to population density, industrial sources, urban green space, and elevation above sea level. The LDP will not drive any improvements in these areas, quite the reverse.

https://www.nhs.uk/news/lifestyle-and-exercise/safe-levels-of-air-pollution-could-still-be-harmful/

Warrington's Air Pollution

Warrington Borough Council is aware of the poor air quality in Warrington. One reason for the Peel Hall application being rejected by the Inspector was air quality. **Warrington had the worst rate of small particulate pollution in the UK for PM2.5 in 2018.**

See the table below:

City or Town	Average Annual PM2.5
Warrington	14µg/m3
Bristol	13µg/m3
Stanford-Le-Hope	13µg/m3
Storrington	13µg/m3
Swansea	13µg/m3

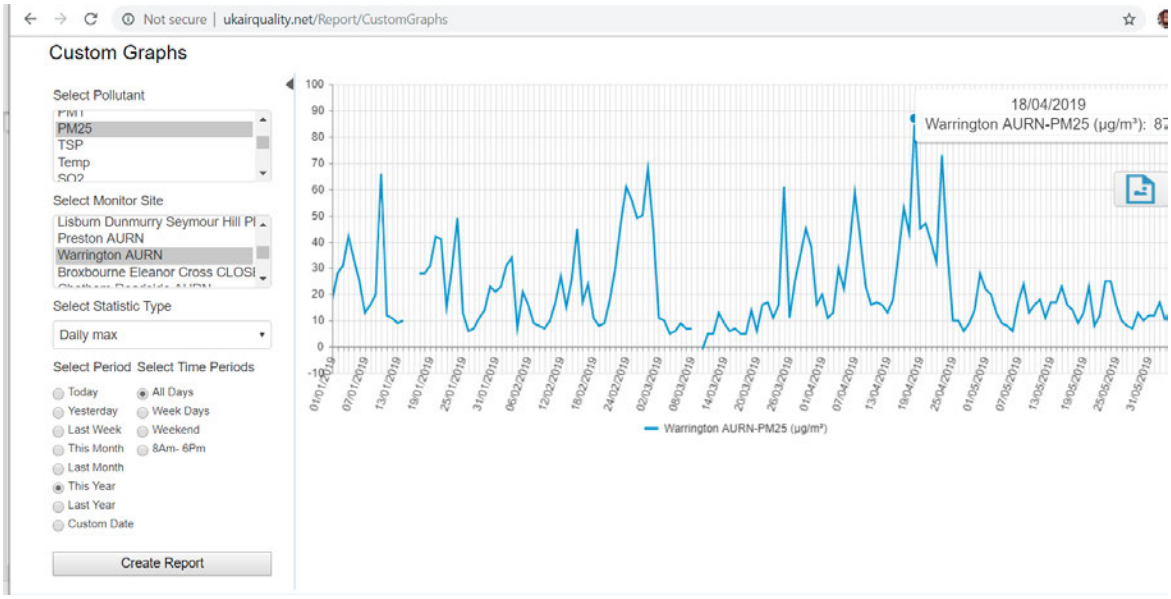
Data taken from WHO Ambient Air Quality Database v11 published on 29th May 2018. British towns and cities drawing or exceeding the WHO limit of 10µg/m3 of pollutant PM2.5. Source: https://www.comparemymove.com/blog/your-move/worst-air-pollution-cities

With reference to the Air Quality Action Plan (AQAP) 5.3.2, WBC state:

> "Whilst the focus of the AQAP is to reduce NO2 concentrations within AQMAs, there is strong evidence of the health impacts from PM2.5. Currently there is one urban background monitoring site measuring PM2.5 within Warrington. **There have been no assessments of any 'hotspots' where concentrations could be raised.**".

This is a very worrying statement. It alludes to the fact that despite the monitoring, no action has been taken. Back in 2016 WBC were named and shamed by the World Health Organisation for breaching safe levels of PM2.5. Since then, nothing has been done, even though PM2.5 has been continually monitored. None of the has been mentioned in the LDP.

Looking at recent live data from the Selby Street monitor it is easy to see daily hotspots (between 30 and 85 ug/m3) which are well over the acceptable limits. Using US EPA / WHO Standards, the current limits within the town are regularly at a dangerous level, at times only just below those of the developing world where unrestricted fossil fuels use is prevalent. Again, the council are fully aware of these dangerous levels.



This graph shows daily maximum readings for 2019, the highest being 87ug/m3.

The network of sampling sites is not comprehensive, and It is noticeable that there are no monitoring sites south of the Manchester Ship Canal. This means that no data has been collected on one of the main arterial routes into Warrington which passes through both residential and commercial areas. The omission, and lack of will, to gather data in and around the M6, A49 and Stockton Heath means that the air quality data provided by Warrington Borough Council is only a 'partial' picture and, therefore, cannot be relied upon to provide a clear overview of the real scale of air pollution in Warrington.

The LDP is predicated upon bringing a further 9, 530 houses and associated vehicles (at least double this fugure, c 20,00 domestic vehicles alone), as well as developing large employment areas which by their very nature will bring a significant number additional of HGV's into the town.

The plan for the Western link will mean that there will be more than 1,000 HGV vehicular movements in a 24-hour period. It is estimated that the employment development area, being almost exclusively based on logistics and warehousing, will generate an additional 2,000 vehicular movements *per hour* onto surrounding roads and junctions in what is to become a vastly built up Garden Suburb.

We believe this is a totally unacceptable figure in terms of the resultant air pollution and will be damaging to human health.

The mortality figures quoted in plan relate to 2013 and 2015. Why is it that the plan is using old data when there is up to date evidence giving a more accurate picture? If particulates increase there is a comparable rise in mortality rate which indicates that these two facts cannot be separated. The LDP states that in 2013 4.8% of all mortality in the town was attributable to man-made particulate pollution and is equivalent to 95 premature deaths. One premature death from air pollution is not acceptable. By pushing this economically driven/developer-led plan, is WBC condoning these deaths and saying that 95 premature deaths is acceptable? These deaths were in 2013 before Warrington was named and shamed by the World Health Organisation. Up to date 2019 data shows that WBC is

the worst offender in the UK. Air pollution is invisible so often goes unchallenged. WBC has a duty of care to its all its residents and needs to ask itself if this is too high a price to pay for economic 'progress'. This is an issue for the whole town; a curtain cannot be drawn along the ship canal, the pollution will kill people in north and south Warrington.

Warrington as we know is unique in the fact that it is surrounded by an extensive network of motorways. The 17-point Air Quality Action Plan in no way mitigates the extent of the pollution that will be generated over the next two decades if this plan is passed.

In conclusion, our overriding position on air quality is this: we oppose, in the strongest and possible terms, to an LDP which will massively increase the levels of traffic and HGV's. Our town has already been identified as the worst in the country for small particulate pollution (PM2.5). The overall effect for our residents will be to expose them to a further increase in dangerously high levels of NO2 and PM2.5 with all the ensuing health risks. We will never support an LDP that condemns the residents of Warrington to a future guaranteed to drive up long term morbidity and premature mortality for the price of a few jobs, levels of which are highly contested.

For these reasons, we believe the air quality data in the LDP to be unsound.

Outstanding Questions

1. Why the network of sampling sites is not comprehensive across the Borough?

2. Why do they not extend south of the Manchester Ship Canal?

3. Why are levels of the small and very dangerous particulate PM2.5 not being reported, even though it is being monitored?

4. What are the Council's plans to act on these high levels of PM2.5?

5. Why are we building our economy on a logistics and transport industry which drives up air pollution?

6. Which health professionals are involved in building a meaningful air quality plan that focusses on protecting our residents? Are they being listened to?