

From: [REDACTED]
To: [Local Plan](#)
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CONSULTATION ON WBC UPDATED PROPOSED SUBMISSION VERSION LOCAL PLAN (2021)

As it stands the plan is NOT effective, sustainable or deliverable.

In particular, I wish to highlight the following issues

Provision of Infrastructure

While the plan identifies additional infrastructure, much of the planning for this is under developed and not funded. Much relies on third parties finding resources outside the control of WBC. e.g. Utility Companies and the NHS. The latter is particularly under pressure and already over subscribed due to previous urban expansion where promises for extra resources never materialised – for example in the South Warrington area. Most worryingly, plans for a new/expanded hospital are still an aspiration.

Inevitably, should this plan be approved, it is clear that new housing will be developed before supporting infrastructure is provided, resulting in deteriorating services for existing residents.

A properly sustainable plan would ensure such facilities are in place before any new housing. Clearly developers should contribute to this and have it made clear that no infrastructure means no development.

This is a primary weakness as there is no credible plan to deliver a sustainable infrastructure in the plan's timeline. However, it is certain that the housing will be delivered within the timescale which will result in a significantly reduced quality of life for all residents.

Transport Plan

Warrington has a unique geography with respect to transport needs. I believe the standard models used by consultants are not fit for purpose as they focus on town centres and radial road systems and are not capable of modelling a road system that is controlled by the Manchester Ship Canal and Bridgewater Canal crossings. It is clear to anyone living south of the canal that the capacity of the road system is currently at or beyond the limit of coping with existing traffic – especially when there are frequent disruptions (such as accidents on the M6). These quickly bring the local road system to a halt. It is going to take more than the proposed minor improvements to the road system to improve matters.

In addition, it is obvious that the type and location of housing proposed for South Warrington will add a significant number of extra cars to the roads. It is disingenuous to suggest that public transport will ameliorate this ... bus services have continued to deteriorate (despite attempts to improve usage) and are basically only used by those who have no other choice. Again, no credible plan has been made to address this.

It is clear that people living in South Warrington are more likely to travel via the motorway network to other towns and cities for work, shopping and leisure – therefore relying on

cars (often in excess of 2 per household). Public transport has no hope of dealing with such travel patterns.

Without significant provision of uninterrupted road crossings of the canal, it is clear that further development in the town has to be north of the canal.

Housing Provision

It is not clear that all brownfield opportunities have been properly identified or that the take of greenbelt properly justified. Developers are clearly more interested in the high-profit development of expensive housing on greenfield sites and need to be incentivised to build on brownfield sites. This not only means that green-belt is unnecessarily released but also has a major effect on affordable housing as the definition of so-called affordable housing is relative to local values ... 80% of expensive is still expensive and does nothing to address Warrington's housing problem but rather provides opportunities for property speculators. Experience has also shown that developers still do their utmost to avoid such provisions and retrospectively buy themselves out of such restrictions.

Environment

This is very much in the news at present. Air quality has significantly deteriorated in South Warrington. This is a particular in Stockton Heath due to the amount of standing traffic and issues caused by congestion due to traffic lights and canal bridges (just sit outside a coffee shop on London Road at busy periods or cycle down the A49). The plan is very weak in this area. It seems that there is a hope that increases in traffic will be compensated by increasing electric car usage (which will take many years beyond the plan period). However, much of the traffic is commercial vehicles and, despite the planned use of electric buses, electric lorries are still some way off. In addition, there is no other proposals to address other sources of vehicle pollution such as brake dust and tyre residue. Inevitably, the plan will result in increasing particulate pollution and provide a deteriorating environment for residents.

Additionally, the land take of green belt impacts the overall environment and ecology of the town with consequential detriment to all residents.

SUMMARY

In summary, the plan is not -

Positively prepared – as the strategy does not meet the area's needs and is not consistent with sustainable development. The plan appears to be driven by growth of housing rather than growing the economy, employment opportunities and supporting infrastructure. This is clearly the wrong way round.

Justified – as it does not take into account reasonable alternatives.

Effective – while housing may well be delivered over the plan period, it is clear that the plan does not provide any confidence that the required infrastructure will materialise (if ever).

Mark & Linda Enderby

[REDACTED]

[REDACTED]

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