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From: Jean McDermott [redacted]
Sent: 14 November 2021 22:23
To: Local Plan
Subject: Representations on the Warrington Updated Proposed Submission Version Local Plan

Dear Sir/Madam,

Warrington Borough Council Updated Local Plan (2021) Consultation

After careful consideration I am writing to set out my challenges to the Warrington updated Local Plan (2021) which I believe is not sound or deliverable. Whilst I welcome some of the changes in the revised Plan, such as the use of the Fiddler's Ferry site and accept that some development will have to take place, I believe that there are better and less harmful ways of delivering it. In addition, there is no justification for a number of the proposals and in other areas there is a lack of detail to substantiate how the Plan will be achieved. My comments, which have particular reference to South Warrington, are as follows: -

There is no clarity over the delivery of the necessary infrastructure to support the planned growth in housing and consequent increases in population and traffic. It is not at all clear when, and indeed if, the necessary new roads, schools, medical facilities, local shopping centres and a new household waste management site would be provided to support the planned growth. Successful growth is dependent on a sound transport plan, particularly given that South Warrington already suffers from serious congestion problems, notably due to geographic constraints associated with problems crossing the Manchester Ship Canal (MSC), River Mersey and Bridgewater Canal, and accessing the M56 at Junction 10 and the M6/M56 at the Lymm junction. The updated Local Plan (2021) has no real substance and details, but is rather a wish list of possible initiatives based on less car usage and increased numbers walking/cycling to work, a new mass transit system, and greater use of public transport, with no serious attempt to cost or justify them.

There are no clear plans detailing how the existing MSC crossings can be expected to handle the vast majority of the hundreds of thousands of extra road journeys each year between South Warrington and the town centre, which would result from the proposals. It has proved virtually impossible to get Peel Holdings to undertake maintenance and painting of the Victorian swing bridges in recent years, and the only high-level bridge frequently needs resurfacing given the volume of traffic which uses it currently. 19th century infrastructure is not capable of handling 21st century traffic demands, but the updated Local Plan does not address this issue satisfactorily or with any confidence that it will actually be deliverable on the ground. Additionally, there are vague references to a new junction on the A49 opposite the Spire hospital but there is no indication of how this can be achieved.

There is a significant lack of detail over the huge £multi-million infrastructure projects which would be required to support the updated Plan (2021). There are no proposals in the revised Plan to build any new crossings over the Bridgewater Canal, so substantially increased volumes of traffic would still be funnelled along the existing road network in South Warrington, primarily through the centre of Stockton Heath, Latchford and Lymm. Nor has any serious thought been given to the impact on air quality along the A49 and A50 and at Junction 20 of the M6 and Junction 10 of the M56. All the extra traffic will worsen pollution and the increasing reliance on road traffic is entirely at odds with the UK's Climate Change aspirations. The whole town currently suffers whenever there are problems on the local motorway network, and with the level of growth envisaged in the updated Local Plan congestion would be particularly severe at J20 of the M6 and J10 of the M56 at such times, not to mention during every morning and evening rush as those living in the new developments head out to work elsewhere.

The argument that thousands of extra people will need housing in the borough because of all the extra jobs which are going to be created is unconvincing. In South Warrington the only proposed new jobs would come from the potential expansion in the Distribution Park between Appleton Thorn and the Lymm motorway junction. The jobs created there will be few in number, as warehousing and logistics are largely automated, and in the not too distant future even the distribution is likely to be in driverless lorries/vans. In addition, these jobs are likely to be for lower skilled workers

who will probably have to commute from outside the South Warrington area, since housing locally would be unaffordable.

The updated Local Plan (2021) is far too ambitious in terms of the number of new houses to be built and based on past experience it is neither realistic nor achievable. In terms of the numbers used the revised Plan is well beyond both official population increase projections and government housing targets, which are themselves likely to be reduced in future. In addition, if developers are expected to provide funding towards the infrastructure needed to support the Plan, they will want to build higher value properties to help cover the costs. The knock-on effects will be a reduction in affordable homes and certain developments will no longer be viable, which again points to the updated Plan not being realistic or deliverable.

Given the above there is no need for the release of green belt land, it should be a last resort under exceptional circumstances and brownfield sites should be built on first. Indeed, the updated Local Plan (2021) does not meet several of the criteria for the release of land from the Green Belt, namely checking the unrestricted sprawl of large built-up areas, safeguarding the countryside from encroachment, preserving the setting and special character of historic settlements and assisting in urban regeneration, by encouraging the recycling of derelict and other urban land. The many woodlands and ponds are also of ecological value and the environmental impact of the loss of Green Belt has not been properly assessed. Finally, just because land is publicly owned, in this instance by Homes England, it is not a justification for releasing Green Belt for development.

In terms of employment and the release of Green Belt land for economic development once again the updated Local Plan (2021) offers no justification for the large-scale expansion it proposes. There is no evidence, nor is it backed by any meaningful economic strategy, for the future development of employment opportunities. As mentioned previously the numbers and types of jobs likely to be created, particularly in South Warrington, will be few in number and predominately lower skilled, with workers unlikely to be able to afford the houses to be built in the immediate area. The growth plans seem to be driven by new housing creating economic benefit instead of the other way around, and no account has been taken of developments in Greater Manchester, Merseyside and Chester where currently significant numbers of people commute for work, shopping and leisure.

In conclusion, I challenge and call into question the figures which have been used to form the basis of the updated Local Plan (2021), particularly in terms of the number of houses to be built which seem to drive many of the other proposals. It is clear that the revised Plan is not sound and does not provide adequate justification for the proposals it contains. There is no coherent economic strategy or evidence base to support the levels of growth, and as a result the Plan, as it currently stands, is unachievable and is not going to be effective at delivering what it sets out to do. From all of the above, it is clear that the updated Local Plan (2021) contains widespread flaws and weaknesses, the most notable ones being – no justification for predicted growth or for the scale of Green Belt release, no clarity on the means of delivery or explanation as to how the already poor transport infrastructure of South Warrington will cope with increased traffic demands placed on it or the damage done by pollution to air quality and to the local ecology.

Yours sincerely

S J McDermott (Mrs)

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