

**Mark Jervis**

**Borough Councillor, Appleton Ward**

**Parish Councillor, Appleton Parish Council**

**Resident Appleton**

**Reference Numbers 1429 and 1424**

Thank you for giving me the opportunity to comment on some of the documents issued during the EIP process. I will make some generic comments on these belated documents before referencing specific documents.

**Generic Points**

1. Whilst I recognise that some of the new documents were in response to specific Inspector queries during the EIP, some documents were issued to address the Council's omissions of evidence or corrections to the evidence provided by the Council.
2. It is very disappointing that Warrington's residents did not have this corrected and omitted information available from the outset of the 2021 Local Plan Consultation process.
3. It is indicative of the shortcomings of this 2021-2038 Updated PSV Local Plan that this information was omitted and/or needed to be corrected. This information relates to key infrastructure and air quality and demonstrates that the Plan is not sound or sustainable.

**CD09, 09a, 09b 29, 29a, 29b, 30 Western Link**

4. The Western Link Project is the largest single infrastructure project in the draft Plan. The Council's discomfort in relation to the increasing cost of this scheme was evident during the EIP when Officers were initially unwilling to update Inspectors on the latest cost forecast for the scheme necessitating CD09 et al, CD29 et al and CD30.
5. In setting out its reasoning for the scheme, the Council clearly acknowledged the extant infrastructure shortcomings in the south of Warrington. In CD29b, the Council admits "*the constituency of Warrington South and the wider borough of Warrington is long overdue significant investment in its transport infrastructure to alleviate the well documented congestion issues it and its residents suffer*". It is therefore disappointing that four years on from this 2018 document, the Council has failed in the draft Local Plan to set out a clear, well defined and holistic highway infrastructure improvement plan to address this situation.
6. The DfT Letter dated 10 April 2019 (last document in CD9b refers) refers to a "*maximum capped funding contribution of £142.5M*". CD09 makes no reference to "*maximum capped*" which is unfortunate. It also makes no reference to the specific DfT conditions attached to the funding. These include the Council needing to have identified "*a preferred bidder with a firm and final price*" and confirmation from the Council of its "*ability to cover all remaining funding over and above the capped Departmental amount*" for the scheme?
7. CD09 revealed a new scheme cost of c£269M which is an increase of £57M. No details were given on the class of this estimate.

8. Furthermore, when the likely adverse impacts on scheme cost of both the ongoing delays and also the technical challenges of delivery of the scheme are taken together with the funding uncertainties and construction sector inflation, there appears to be no immediate prospect of the Council being able to submit a credible business case for this scheme.

9. As such, the Draft PSV Plan cannot demonstrate delivery of a cornerstone of its infrastructure proposals to relieve just a small part of congestion in the south of Warrington. This makes the Plan unsound with regard to the major development proposals south of the Ship Canal and the Bridgewater Canal.

10. The CD09b correction is incorrect. For all of the above reasons, it erroneously claims that £212,700 of funding for the scheme is "FUNDING CONFIRMED". It is not. Furthermore, the proposed Council funding approval can no longer be considered to be valid as it was approved against an Outline Business case which itself is no longer valid due to cost increases and time delays.

### **CD28 East-West Connectivity**

11. The lack of visibility on this east-west connectivity issue ahead of this late document is a major flaw in the Local Plan Consultation exercise.

12. This document reveals the prospect of an A49/A50 link/rat-run which will put further pressure on the already severely congested roads in this area particularly at the A49 junctions of the "D-link" in the SEWUE.

13. It opens up the prospect of HGVs/LGVs/Transit delivery vans and employee cars associated with the SE Warrington Employment Area placing a massive burden on roads in south Warrington whilst transiting to/from J10 M56, the Daresbury Expressway to access Runcorn/Halton/Widnes/South Liverpool and the proposed Western Link.

14. This will generate unacceptable congestion in Appleton, Stretton, Appleton Thorn, Stockton Heath, Grappenhall and beyond.

15. The impact of such traffic was not properly considered or quantified when the Six/56 planning application (2019/34799) was considered by the Council's Development Management Committee.

16. Spawforths representing Langtree said during the EIP that the Employment Area was the perfect base for 1000s of electric Transit type local distribution/delivery vehicles because of the daily charged range of such vehicles.

17. This impact of such vehicles has not had proper examination.

18. As the Ward Councillor for Appleton, I am fully aware of the HGV restriction from the Cat and Lion junction in Stretton through Appleton Thorn to Barleycastle Trading Estate. This is very important to preserving the special character of this area.

19. No such restriction is mentioned in this late Council/Developer submission.

20. It is difficult to see how that weight restriction would be implemented on the new "D-link" road. Even if it were possible, the link road would still create enormous volumes of lighter traffic transiting to and from the proposed employment area.

21. The Masterplan Development Framework (MDF) is no assurance to local people as it is anti-democratic and non-accountable in terms of monitoring development. There is no mention of this east-west Link in the MDF quoted in the SoCG document (SG04) referenced in Paragraph 1.4.3 of the CD28 document.

22. This new link road will significantly affect the character of Stretton and Appleton Thorn because of the traffic which will transit on this road to avoid longer journeys on the motorways.

22. The modal shift aspirations in paragraphs 1.3.13 and 1.4.8 of CD28 are not quantified and therefore cannot be relied on.

23. Paragraph 1.2.2 of CD28 says that “WBC is not seeking a ‘direct connection’ to the A50”. It claims that it simply wants vehicles from the SEWUE “to efficiently access the A50”. This is nonsense. This link road will generate significant through traffic due to the D link to the A49 and Jn10 M56.

24. The infrastructure proposals referenced in Paragraphs 1.3.1 and 1.3.2 are ill defined in terms of scope cost and timing. They are not “comprehensive” and cannot be relied upon in making judgements on SEWUE and SEWEA.

### **Conclusion**

25. For all of the above reasons, the Council’s Local Plan proposals in the south of Warrington fail the test of soundness and sustainability.