From:
 Local Plan

 To:
 Lop objection

 Subject:
 LDP objection

 Date:
 11 June 2019 10:45:46

I wish to object to the draft LDP specifically w.r.t. plans for the "Garden Suburb" on the following grounds ...

- 1. The grounds for growth both in housing and employment have no sound basis particularly given official population growth figures. The justification based on the Governments need to deliver national housing growth is not sustainable (especially given the excessive WBC 10% "flexibility" figure). The ambitions for employment growth are also not justified and appear to be solely those of the Council rather than residents. The single focus on logistics for employment growth is damaging to public health and the environment. The justification employment growth should go hand in hand with housing is a unsound given the majority of employees are unlikely to be living in the Garden Suburb. If there has to be employment zones then a mixture of "high tech" and SMEs would be more appropriate to this area.
- 2. There is a clear preference by developers (as evidenced by previous applications) for green belt development and a resistance to "affordable" housing. In fact, given the desirability and high average prices in this area, any "affordable" housing will not provide the affordable housing that Warrington needs.
- 3. Given green belt release is justified on this growth, the reasoning can hardly be seen as exceptional. The green belt analysis is highly subjective and dependent on how land packages are combined. In particular, the differing impact on settlement separation that the packaging output gives between north and south Warrington is used to justify the infill development which will radically alter the character and distinctiveness of the 3 main villages within the development. This provides no confidence in the process.
- 4. The fact that Government own significant parcels of land in the Garden Suburb means that they have a vested interest in the development going forward.
- 5. The plan doesn't take into account Warrington's unique transport issues and constraints. In particular, the issue of canal crossings is not adequately addressed. The suggestion by consultants in the transport appendix that a new crossing in the Grappenhall area is desirable appears to have been ignored by the main report
- 6. South Warrington already has a deficit in supporting infrastructure following the failure of WBC to completely deliver previous development in the 90s. The LDP doesn't properly address this deficit and gives no confidence that proposed infrastructure will be delivered in a timely fashion. This can only place a further burden on already overloaded facilities.
- 7. South Warrington already suffers from poor quality due to traffic pollution especially from the adjacent motorways. The claim that this will be mitigated by a few minor road alterations and a move to electric vehicles is ludicrous. There is no indication that the new homeowners will be discouraged from car ownership and the extra trips originating from

- the new housing will be in excess of 90,000 plus the inevitable increase of LGVs making deliveries. This will further increase congestion and reduce air quality to the health disbenefit of all residents as well as increased negative impact on the environment.
- 8. The focus on the logistics industry will increase the number of HGVs significantly. While notionally limited to the south east corner of the Garden Suburb, there will be a disproportionate increase in pollution given that there is, as yet, no roadmap for moving HGVs away from the use of diesel. Notional government targets are 2040 but there is, as yet, no sign of commercial alternative-fuel HGVs nearing commercial availability. There is an additional concern that one of the few roads indicated in detail the J10/M56 interconnector could provide and extra route for HGV traffic into this development.
- 9. Given the current concerns over climate change, pollution and sustainability the LDP does not give any confidence that it satisfactorily addresses any of these.
- 10. Finally questions arise over the deliverability of the plan. Housing build rates are higher than those delivered within the Borough in the past. History has shown that the Council have not had the resolve when enforcing infrastructure contributions from developers on appeal. Additionally there are some "big ticket" transport infrastructure items that are essential for the LDP to be anything like viable i.e. public transport and canal crossings. All these reduce the confidence that the plan is sustainable and can be delivered.

Regards

Mark Enderby