From:
 Local Plan

 To:
 Local Plan

 Subject:
 Objection to LDP

 Date:
 13 June 2019 17:57:55

To whom it may concern

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

- The grounds for growth both in housing and employment have no justifiable basis, given the official population growth figures. The rationale 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 reason many people choose to live in this area is so they can commute to Manchester/Liverpool, they do not work or spend their money in Warrington. The limited focus on logistics for employment growth is short sighted and damaging to public health and the environment. The justification that employment growth should go hand in hand with housing is 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.
- There is a clear preference by developers, as per 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.
- 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, thereby removing a unique selling point. This provides no confidence in the process.
- 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.
- The plan doesn't take into account Warrington's unique geographical position. 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. I note that via a recent newspaper report that a 5 year study has been suggested, on adoption of the LDP4, on the location and mode of transport to be carried, for another crossing over the canal as clearly the western link will not ease traffic on the A50/A49. The infrastructure should be in place beforehand to deal with increased traffic.
- 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, you would have hoped that lessons could have been learned from the Chapelford development. This can only place a further burden on already overloaded facilities.
- There have been recent proposals to close Stockton Heath waste facility, it is temporarily

- on hold pending finding an alternative location, why isn't this shown on the LDP? It is also stated that a Travellers Encampment will be located in the "Garden Suburb", presuming this is the one that is already there, why is it not shown on the plan?
- 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 and detriment to health of all residents as well as increased negative impact on the environment.
- 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. Government targets are 0% by 2050 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.
- Given the current concerns over climate change, pollution and sustainability the LDP does not give any confidence that it satisfactorily addresses any of these.
- 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.
- In light of the recent announcement that Fiddlers Ferry power station will close in 2020, the plan should be revised to take this brownfield site into consideration for new housing and relieve the burden on south Warrington.

Linda Enderby	
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