

**From:** [REDACTED]  
**Sent:** 17 June 2019 14:53  
**To:** Local Plan  
**Subject:** Representations to the Local Plan Submission Draft.

To whom it may concern

Please record this email as my representation and objection to the above.

I find the following issues to prompt my assertion that the plan is not sound and should be reviewed and substantially modified prior to submission to the Secretary of State.

- There is not justification for the scale of growth proposed. The strategically favourable is wrongly accepted as justifying the promotion of growth at all costs. This ignores the position of the NPPF in supporting sustainable development and the accommodation of the right development in the right place. The Plan advocates the wrong development in the wrong place. This is exemplified by the allocation of an employment site in the far south eastern corner of the Borough at the furthest possible point from existing potential sources of labour. The Submission Draft presents Warrington as a successful location for business with high employment and low unemployment. The allocation of an employment site in the location proposed is inconsistent with sensible interpretation of the objectives of the NPPF. The Plan anticipates levels of growth which have rarely be secured at any point in the past.

- Given the untested and dubious premise for growth, the scale and location of housing and employment development is wholly unjustified. The release of Green Belt for 9000 dwellings and 116ha of employment land in South Warrington is wholly unnecessary and is not justified in the terms required by the Framework.

- The Submission Draft accepts issues with current levels of air pollution and the health impacts of poor air quality yet the plan seeks to perpetuate development which can only be supported by use of the private car and the movement of freight by road. The suggested policies of the emerging plan relating to access to rail and the control over development which impacts on air quality are contradicted by the site allocations.

- South Warrington is a place of character and distinction. The settlements of the area, their setting, the value of the landscape around them and the value of the built heritage within them, generate this character and distinctiveness, which the Plan overtly seeks to protect. The Plan, particularly in terms of the scale and location of the development proposes acts in a manner entirely to the detriment of this objective.

- The allocations are a series of broad frameworks with little no clarity as to how and when they might be delivered and how infrastructure requirements can be brought forward to service the development proposed. Road schemes are incomplete and simply load traffic onto already congested routes, including Victorian swing bridges. There is no clarity as to how the development might secure sufficient funding to deliver the required provision of infrastructure in terms of the schools, health facilities and open space. There is concern that the viability of development will be compromised and will not come forward in the manner expected because of the high levels of developer contribution required. The detailed content of policies MD2 and MD3 provide ample examples.

- The proposed development will do nothing in terms of improving levels of equality and wellbeing and is likely to have a negative rather than a positive impact on town centre regeneration.

The Plan is not sound and should not proceed in its present form.

John Groves MRTPI

