



**Subject:**  
**Date:**



Local Plan Representation  
17 June 2019 13:16:54

---

Dear Sir / Madam

Thank you for providing the opportunity to consult on the Local Plan – Proposed Submission Version (LP – PSV). In providing this response I also refer to the Local Transport Plan (LTP 4) given its relevance in providing sustainable transport and highways infrastructure to deliver the Local Plan. Having carefully reviewed and considered the LP – PSV I do not believe that it is either sound or deliverable without significant impacts on existing local communities, unsustainable pressures on local highways and transport infrastructure and irreversible and unjustified loss of Green Belt, in contravention of the National Planning Policy Framework (NPPF).

I consider the LP – PSV to be unsound and flawed in both its evidence base and forecasts because:

- Growth data are based on superseded and over-ambitious growth assumptions
- The case for development on the Green Belt is poorly made; for example, it fails to meet the criteria specified in the NPPF and fails to fully take account of brownfield land provision, for example, Fiddlers Ferry power station site which I understand is due to close next year
- There is overwhelming provision for commercial premises near Appleton Thorn/ Grappenhall, situated on approx. 365 hectares, much of which is in Green Belt
- The proposals will encourage unsustainable urban sprawl, leading to destruction of local village and local centre characters
- There will be adverse effects on the setting and amenity of designated conservation areas
- There will be adverse effects on biodiversity and landscape character
- Significant increases in traffic movements, placing additional burdens on already over-stretched local road networks. [REDACTED] Latchford swing bridge, where traffic congestion (irrespective of but exacerbated by ship movements on the Canal) has grown progressively worse over recent years and which will only deteriorate further through unsustainable levels of commercial and residential development to the south of the ship canal
- LTP4 is lacking in any detail to address highways and transport infrastructure impacts – there is no integrated transport masterplan or evidence base to demonstrate that the proposals can be delivered sustainably. This cannot be left to the uncertainties and vagaries of S.106 agreements and other 'downstream' planning remedies, which would be unable to satisfactorily deal with this scale of development and in the fragmented manner in which it will be delivered
- The LP-PSV as proposed will have detrimental effects on existing social infrastructure – schools, health services, care services etc. – especially when considering the extent to which the Council seems to be diminishing Council services in south Warrington
- Warrington Borough Council appears to have ignored the material concerns raised through the previous round of PDO consultations -the consultation process to date has proven to be a token gesture and leaves the whole consultation process open to challenge.

I should be grateful if you could record my representation on the consultation register and keep me informed of the next stages of the process.

Yours faithfully,

Simon Hill

