

From: [REDACTED]
To: [Local Plan](#)
Subject: Local Plan Response - Winwick Parish & other Warrington Residents
Date: 15 November 2021 14:18:54
Attachments: [REDACTED]

Good Afternoon

Please find attached a response to the Draft Local Plan from 560 Winwick and other Warrington Residents. I would appreciate if you can acknowledge receipt of this response by return.

We also wish to place on record our dismay at the way in which instructions in how to respond to this proposal were communicated. During our time talking to residents, we were told on numerous occasions that, in trying to complete your online response form, many residents just "gave up from frustration". It was not publicised enough that submission of comments via email was acceptable, so many residents were under the impression that the form was the only way to respond. For many older residents, who do not have regular access to the internet, they did not have any instructions on how they could respond without making a physical trip to one of the roadshow events, which during this pandemic many were reluctant to do so.

We feel that a lot of valuable feedback has been lost because of the above, and would question if this makes the consultation meaningful in such an important decision for both our local area and that of Warrington in itself

Andrew Griffiths

On behalf of Winwick and other Warrington Residents

Updated Proposed Submission Version Local Plan

Our draft Local Plan, otherwise known as our Updated Proposed Submission Version Local Plan, will be our guiding framework for future development and infrastructure provision in Warrington.

Our previous draft Local Plan, published in March 2019, received around 3,200 responses to the consultation. We have taken on board many of the views of local people - much of which focused on how brownfield sites should continue to be prioritised ahead of Green Belt. This, along with the profound impact of the COVID-19 pandemic and changing Government housing methodology, has meant that, in preparing our updated draft Local Plan, we are proposing some big changes.

Useful documents

You can read about these changes in more detail on our website, warrington.gov.uk where you can also read guidance to help you make your representation. You can also request a paper copy by emailing localplan@warrington.gov.uk.

Data Protection and Confidentiality

We comply with all legislation governing the protection of personal information, including the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). The information you provide through this survey will be kept secure and analysed by Warrington Borough Council.

To find out more please see [Data protection policy](#) | warrington.gov.uk
[Privacy policy](#) | warrington.gov.uk

Other formats

If you have any concerns or questions about the survey, require the questionnaire in another language or format including large print, Braille, audio or British Sign Language or simply require assistance in completing the form please email equalities@warrington.gov.uk

Proposed Submission Version Local Plan Form PART A - About You

1. Please complete the following:

| | |
|-------------------------------------|------------------|
| Name of person completing the form: | Andrew Griffiths |
| Email address: | [REDACTED] |

2. What type of respondent are you? Please select one option only.

If you are an agent please select the type of client you are representing.

- A local resident who lives in Warrington
- A person who works in Warrington
- Local Borough, Town or Parish Councillor
- Local Business owner/Manager
- A group or organisation



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- Visitor to Warrington
- A Developer / Landowner
- Other (please specify):

3. Please provide your contact details:

| | |
|-----------------------------------|--|
| Organisation name (if applicable) | On behalf of Winwick & Other Residents |
| Agent name (if applicable) | |
| Address 1 | ██████████ |
| Address 2 | ██████████ |
| Postal Town | ██████ |
| Postcode | ██████ |
| Telephone number | ██████████ |

Proposed Submission Version Local Plan Form PART B Representation Form

1. **To which part of the Local Plan does this representation relate?** Please write in the space below.

2. **Does your comment relate to a specific paragraph (s) or policy sub-number (s)?** Please select one option.

- A paragraph number (s)
- A policy sub-number (s)
- Both of the above
- None of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

3. **Do you consider the Draft Local Plan is:** Please select one option in each row.

| | Yes | No |
|---------------------------------------|--------------------------|-------------------------------------|
| Legally Compliant | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Sound | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Compliant with the Duty to Co-operate | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

4. **If you have answered 'No' to any of the options in the above question then please give details in the box on the next page of why you consider the Draft Local Plan is not legally compliant or**



is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Please see attached response for details

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Please note: your representation should succinctly cover all the information, evidence and supporting information necessary to support / justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he / she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

(If yes, I understand details from Part A will be used for contact purposes)



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If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Our response is on behalf of over 500 residents and as such represents significant opposition and concerns to the Local Plan for Winwick Parish. We believe it is important to ensure the views of our residents are represented correctly

8. If you wish to include documents to support your representation form then please attach to your submission and use the space below to provide a brief description.

Attached are details of our concerns and issues with the plan

Proposed Submission Version Local Plan Form PART C - About You

We are committed to ensuring our services are provided fairly and are accessible to those who need them. To help us meet this commitment, we ask all customers to complete an equality and diversity monitoring form.

The reason why we ask you these questions is so we can:

- Make our council services open to everyone in Warrington
- Treat everyone fairly and appropriately when they use our services
- In consultations, make sure that we have views from all across Warrington
- The Equality Act 2010 makes these aims part of our legal duties. Your answers help us check that we have met the law and help improve our services.

Data Protection and Confidentiality

We comply with all legislation governing the protection of personal information, including the Data Protection Act 2018 and the General Data Protection Regulation (GDPR)

These monitoring questions are optional. You do not need to answer any of the following questions if you do not wish to, and you will not be affected in any way if you choose not to answer any, or some, of the questions. Questions have 'prefer not to say' as a response option.

Please only complete this section if you are responding as an individual.

1. Age

- | | |
|--|--|
| <input type="checkbox"/> Below 16 If below 16, please state age in the box below | <input type="checkbox"/> 55-64 |
| <input type="checkbox"/> 16-24 | <input type="checkbox"/> 65-74 |
| <input type="checkbox"/> 25-34 | <input type="checkbox"/> 75-84 |
| <input type="checkbox"/> 35-44 | <input type="checkbox"/> 85 or over |
| <input type="checkbox"/> 45-54 | <input type="checkbox"/> Prefer not to say |

Age, if under 16



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2. Gender

- Male Non-Binary
 Female Prefer not to say

You prefer to use your own term, please specify here

3. Is your gender identity the same as your sex registered at birth? Please select one option.

- Yes No Prefer not to say

4. What is your relationship status? Please select one option.

- Single Widowed
 Married In a same sex marriage
 Co-habiting In a same sex civil partnership
 Separated Prefer not to say
 Divorced
 Other (please specify):

5. How would you describe your ethnic group? Please select one option and then one option from A-E

- White (go to A)
 Asian or Asian British (go to B)
 Mixed or multiple ethnic groups (go to C)
 Black, Black British, Caribbean or African (go to D)
 Other ethnic group (go to E)
 Prefer not to say (go to Q6)

A. White

- English, Welsh, Scottish, Northern Irish or British
 Irish
 Gypsy or Irish Traveller
 Roma
 Any other white background (please state)

B. Asian or Asian British

- Indian
 Pakistani
 Bangladeshi
 Chinese
 Any other Asian background (please state)



C. Mixed or Multiple ethnic groups

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other mixed background (please state)

D. Black, Black British, Caribbean or African

- Caribbean
- African
- Any other Black, Black British or Caribbean background (please state)

E. Other ethnic group

- Arab
- Any other ethnic group (please state)

6. How would you describe yourself? Please select one option.

- Straight/Heterosexual
- Lesbian/Gay woman
- Gay man
- Bisexual
- Other sexual orientation
- Prefer not to say

7. Your religion or belief. Which group below do you most identify with? Please select one option.

- No religion or belief
- Christian *(including Church of England, Catholic, Protestant and all other Christian denominations)*
- Buddhist
- Hindu
- Any other religion.(please specify):
- Jewish
- Muslim
- Sikh
- Prefer not to say

8. Are you currently pregnant or have you been pregnant in the last year? Please select one option.

- Yes
- No
- Prefer not to say



9. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? Please select one option.

- Yes a little
- Yes a lot
- No (do not answer the next question)
- Prefer not to say (do not answer the next question)

10. If you answered 'yes' to the previous question, please state the type of impairment.

If you have more than one please tick all that apply.

- Physical Impairment
- Sensory Impairment
- Learning Disability/Difficulty
- Long-standing illness
- Other (please state):
- Mental Health condition
- Autistic Spectrum
- Other Developmental Condition

Please return to:

**Local Plan,
Planning Policy and Programmes,
Warrington Borough Council,
East annexe Town Hall,
Sankey Street,
Warrington,
WA1 1UH**



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Response to the Warrington Borough Council Proposed Local Plan 2021 Winwick Parish Residents

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- Section 2 – Traffic Concerns for Proposed Developments MD4 & OS6
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- Appendix A - Travel time Time details Details from Proposed Development MD4
- Appendix B – List of Residents

This document has been prepared by and submitted on behalf of a group of 560 residents of the Parish of Winwick and other areas of Warrington. A list of these residents is included in Appendix B

Overall Feedback & Summary of Response

We believe that the Proposed Local Plan has several significant issues both in general and with developments that affect our Parish directly.

1. The Plan increases the town's reliance upon road transport. It puts significant strain on already congested roads without additional infrastructure in place. It generates employment opportunities, which are likely to be through warehouse operations that rely on already overloaded motorway junctions and generate little employment opportunities because of the prevalence of automation in modern distribution. Such employment is likely to be low-skilled. It seems to do nothing to seek to create jobs in the green economy or higher up the skills ladder
2. It is not focussed on addressing environmental issues. The reliance on road transport will increase pollution, while removing green belt and green field space. In January 2020, Warrington was named as the third worst place in the North West for pollution related deaths (<https://www.warrington-worldwide.co.uk/2020/01/27/warrington-ranked-third-worst-for-deaths-from-deadly-toxins-air-pollution-in-north-west/>) and has been criticised by the WHO. This Plan does not help address these issues in any way, shape, or form.
3. It appears to be based on flawed data points which are used inconsistently. The predicted requirements for housing are based on outdated information; yet requirements, for example, on schooling are based on more up to date information. This creates imbalances in the Plan.

4. The Plan requires the release of Green Belt land without a correct justification. The NPF states:

140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

141. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making Authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

(a) makes as much use as possible of suitable brownfield sites and underutilised land;

Exceptional circumstances have not been demonstrated in this plan. The council states that there is not enough Brownfield land available to satisfy the requirements for housing, but these requirements have been overstated, and planning is continually granted for non-residential purposes (for example, Self-Storage units on Winwick Road). Existing non-residential land goes wasted, and the plan seems not to have considered offering incentives or requirements for landowners to release under-utilised land before releasing Green Belt (for example, the Junction 9 Retail Park).

5. There is no detail of how the Plan will result in the regeneration of the Town Centre, or preserve the individual identity of outlying settlements, both of which are stated aims of the plan. Indeed, the plan will increase the number of dwellings in our Winwick Parish by over 50%, adding over 1300 homes to approximately 2000 existing, in contradiction to these aims. We fail to see how the existing identity of Winwick Parish could survive such a massive increase.
6. There is no clarity on how this Plan would be delivered. Details of important infrastructure items such as roads, additional Health services such as GP Surgeries and a new Warrington Hospital are vague and not part of the plan itself. Winwick Parish itself is very poorly served in this respect with no GP practices, no dental practice, and only limited convenience store/farm shop retail offerings.

In the following sections, specific concerns have been highlighted in ***Bold Italic*** text, but can be summarised as follows:

1. It is not possible to provide local education capacity to the Proposed Development OS6 in contrary to the conclusions of the plan, and education for all age groups would require trips in private cars.
2. The Local Plan relies upon unapproved road improvements reliant upon approval of the Parkside development.
3. Increased traffic represents a significant safety issue to children and adults in Winwick, as well as increased pollution and the associated health-related issues.
4. The Local Plan has underestimated the impact of additional traffic on the junctions within Winwick, specifically those on Myddleton Lane, Golborne Road and Waterworks Lane. It also relies upon rural lanes, which have changed little since the 19th Century, to be able to absorb traffic when they are already congested. Delph Lane, for example, runs from Myddleton Lane in Winwick and joins Mill Lane in Houghton Green. It is narrow in parts and has bends which are difficult to navigate and already present a significant hazard.
5. The inability to provide local services for Proposed Development OS6 in contradiction to Policy IMF1.
6. Releasing Green Belt at Proposed Development OS6 will result in risk to groundwater supplies, and there is no evidence that site OS6 has been discussed with United Utilities.
7. We feel that inadequate consideration to the impact on historical assets has been made for Proposed Development OS6 in contradiction to Policy DC2.

We wish to formally register that we disagree with the Proposed Local Plan, we believe it **not to have met the requirements stated by Government** and oppose its implementation. We believe it **not to have met the requirements of Duty to Cooperate**, it has **not been prepared positively**, it is **not justified, effective, or consistent with National policies**. We feel it also **contains errors** which result in the Local Plan being **unachievable**.

We are happy to provide representation to any inspection and will work constructively with WBC and the Inspector to look for potential remedies in resolving our concerns.

Section 1: Inability to Provide Suitable Primary Education for Proposed Development OS6

The NPFF states:

“ 95. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and

b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.”

Winwick CofE Primary School is the main primary school facility for Winwick Parish. It broadly serves the area shown below from the Winwick & Burtonwood ward.



Based on the 2011 Census data, this area contains 914 dwellings.

However, the Local Plan indicates that the Winwick centre covers an area bounded by the A49 to the West, Winwick Link Road to the South and East, and Green Lane to the North.



Source: Local Plan Spatial Strategy Display Board - https://www.warrington.gov.uk/sites/default/files/2021-10/local_plan_display_boards_-_september_2021_0.pdf

This erroneously excludes the dwellings on the Winwick Park estate and in Hermitage Green and results in a potential underestimate in the number of required pupil places at Winwick CofE Primary, despite being in the school's catchment area.

From the school website, details on the admissions for 2021 are

The September 2021 Admissions Numbers according to the ADMISSIONS CRITERIA

1. Children in care or formerly in care - 0 pupils
2. Children with an exceptional medical/ social need where admissions to the school might help them satisfy that need - 0 pupils
3. Children whose parents attend worship at St Oswald's Church Winwick on a regular basis - 10 pupils
4. Children who have a sibling who will be still attending the school at the time of admissions - 11 pupils
5. Children whose parents attend another Christian Church on a regular basis and are resident within the parish of St Oswald's Winwick - 1 pupil
6. Any other child who does not appear in any of the above categories - 8 pupils

The last distance allocated under Criteria 6 was 1.418 miles.

Total number of applications received: 57 pupils

First choice places: 29 pupils

Second choice places: 12 pupils

Third choice places: 15 pupils

Total applications received from Local Authorities

Warrington LA: 40 applications

St Helen's LA: 15 applications

Wigan LA: 2 applications

The last distance mentioned is broadly in-line with the Parish boundaries and would indicate that the school was fully subscribed with existing demand from the current dwellings. According to OFSTED, the school has a total capacity of 210 places. Due to location constraints, it is accepted that the school cannot expand to offer an additional intake class or expand the current intake to offer additional places.

In response to an FOI request, the borough education team provided a response containing the following information

2.1.1 Live births overall appear to have peaked at 2563 per year and since then have stayed just under this level, with births for 2017/2018 currently at 2086. Recent reception intakes appear to be indicating that the peak intake of 2604 in 2015/16 has now passed, with the likely impact on the availability of school places now being significant housing development that is coming forward and the outcome of the review of the spatial development local area plan, which seeks to set housing development output for the next 20 years.

https://www.whatdotheyknow.com/request/school_place_planning_strategy_d_73#incoming-1587303

The 2021 proposed local plan does not detail the formula used to calculate school places per dwelling, but the 2017 plan had the following information

Pupil per dwelling calculator.

Enhancing Existing Education Provision

3.48 Planning contributions will be sought in connection with proposed housing developments of 11 or more units (or with a maximum combined gross floorspace of more than 1000sqm) where the new housing will generate a need that cannot be met by existing local facilities.

3.49 Consideration of the following two factors will indicate the degree of any shortfall of provision:

(i) The number of pupils expected to be generated by the proposed development. In order to calculate this figure, the Council uses the following child yields, based on the most recent census data:

Primary School child yield – 0.30 pupils per family home (2 bed dwelling and above); Secondary School child yield – 0.18 pupils per family home (2 bed dwelling and above).

Source: Warrington Draft Local Plan 2017

Using this calculation, it would forecast a demand of 274 pupils for the existing dwellings within the immediate area. The conditions for OS6 note that the developer will need to contribute to provide additional school capacity, and the total number of dwellings in the proposed Plan together with existing un-developed planning permission is 147. This leads to an additional 44 primary school places required (147x0.3).

From all this information, we can determine the following:

- The school is currently fully subscribed from the existing dwellings within Warrington Local Authority.
- Birth rate will likely generate similar demand to the 2021 admissions going forward.
- From the 2017 calculation there is a shortage of 64 places within the area.
- The school cannot be extended with additional capacity.
- Un-developed existing planning permission and proposed dwellings in the 2021 Local Plan from OS6 alone will generate additional required school places (44).
- Capacity cannot be provided by refusing places from other Local Authorities.

This means that there is no possibility to provide school places for the proposed developments in the local area, which is in contradiction to the NPPF. It means that any children in these proposed developments would need to travel out of the local area to school, most likely via private car, generating additional traffic and the associated pollution.

Section 2: Underestimates in Traffic Planning Scenarios and Safety Concerns for Proposed Developments OS6 and MD4

Scenario 2 in the Transport Model Testing Appendix A shows that the junction of A573 Golborne Road and Myddleton Lane is above 100% V/C in both AM and PM time periods



Scenario 2 – AM V/C Plot



Scenario 2 PM V/C Plot

Scenario 2 is reliant upon the Parkside Development – A49 Junction improvements being developed as per the Development Enablers on Page 37 of the Transport Model Testing Document.

Table 5-4. Highway Infrastructure Schemes Deemed 'Development Enablers'

| Scheme Name | 'Needed by' |
|--|-------------|
| Warrington South Strategic Infrastructure – Existing Junction upgrades | 2031 |
| Warrington South Strategic Infrastructure – New link Stretton Road to A49 (Phase 1) | 2031 |
| Warrington South Strategic Infrastructure – New link Stretton Road to A49 (Phase 2) | 2038 |
| Warrington South Strategic Infrastructure – the “D” – Witherin Ave/Dipping Brook Link | 2031 |
| Warrington South Strategic Infrastructure – New link to Grappenhall Lane & Barleycastle Lane upgrade | 2031 |
| Parkside Link A | 2031 |
| Parkside Link B | 2031 |
| Parkside – A49 improvements | 2031 |
| Highways England Concept Mitigation at M56 J10 | 2031 |
| Highways England Medium Term Concept Mitigation at M6 J20 | 2031 |

This development, reference 2018/32247, has currently been refused planning permission by WBC. The entire Parkside development is currently awaiting a decision by the Secretary of State after a public inquiry and may not be granted permission. It has also not been proven how deliverable the Parkside – A49 Improvements Plan is by Parkside Regeneration LLP.

If this development is not delivered, Scenario 1 would be in effect in this area, and the junction at A49 Newton Road and A572 Winwick Link Road is additionally shown as >100% V/C in PM.



Scenario 1 V/C Plot – PM

These junctions are both within proximity to the Winwick CofE Primary school referenced in Section 1 of this response.



A49 – A572 Junction – 0.3 miles

A573 – Myddleton Lane – 226ft

This represents a significant safety issue for children and their parents who walk to and from the School via these junctions. It also results in an increase in pollution caused by both increased traffic flows and traffic delays/queues to the area close to the school.

The scenario planning is also based on children living in Proposed Development OS6 attending this school. As shown in Section 1 of this response, this is unlikely, and will mean a significant number of the children need to travel by private car to school. If we assume that most of these children would attend an alternative school within Warrington Borough, the closest schools are shown below



Given the majority of schools are South or East of the proposed development OS6, and it is not possible to travel in this direction via Waterworks Lane/Winwick Link Road, it can be assumed that all traffic will use the junction of A573 and Myddleton Lane.

This will further increase the traffic flows at this junction in addition to those modelled in the Transport Planning, increasing safety and pollution concerns and is inconsistent with the strategy proposed in Warrington Borough Council's Air Quality Action Plan (2017-2022).

The Warrington LAQM Annual Status Report 2020 states the below in reference to NO2 levels

Along the A49 Winwick Road concentrations have improved but there remains a locations that have a risk of exceedance. Winwick Road 1 (DT31) is showing further reductions to 30.2 µg/m³. Winwick Road location 2 (DT32) shows a marginal risk of exceedance whilst Winwick Road 3 (DT33) measure 39.8 µg/m³, at the objective limit but has improved since 2018.

Detailed results are shown below, with exceedances of the Annual Target shown in Bold

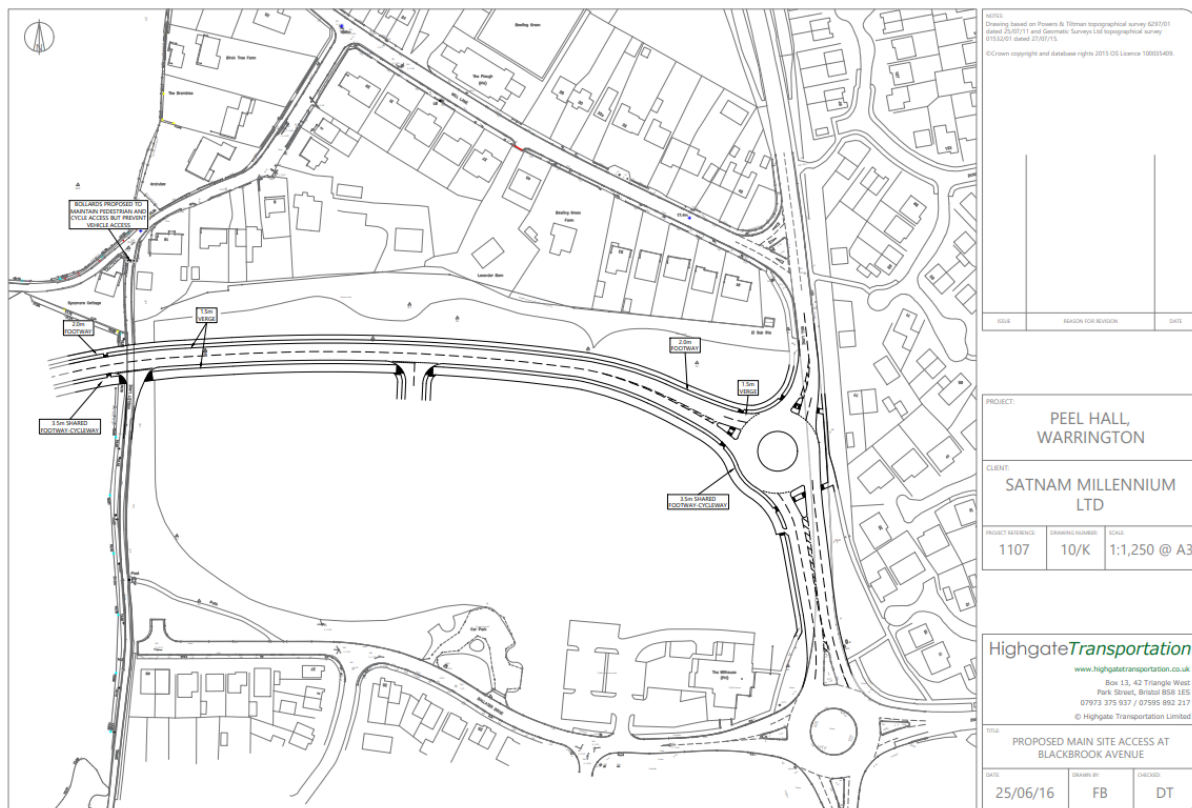
| | | | | | | | | | | | |
|-----------------------------|--------|--------|----------|----------------|------|------|-------------|-----------|-------------|-------------|------|
| DT31 (WA95 Winwick Road 1) | 360598 | 389820 | Roadside | Diffusion Tube | 100 | 100 | 39.5 | 39.9 | 34.7 | 32.6 | 30.2 |
| DT32 (WA96 Winwick Road 2) | 360484 | 390416 | Roadside | Diffusion Tube | 83.3 | 83.3 | 47.2 | 50 | 44.2 | 40.3 | 36.6 |
| DT33 (WA112 Winwick Road 3) | 360434 | 390968 | Roadside | Diffusion Tube | 91.7 | 91.7 | 52 | 55 | 49.3 | 43.9 | 39.8 |

Sources LAQM Annual Status Report 2020 Pages 17/29

The route covered by these monitors is likely to be used by both MD4 and OS6 Proposed Developments to travel into Warrington Town Center and will further add to the already existing pollution issues.

These limits exceeded the targets during 2020 when traffic was lower due to COVID-19 Guidance and **lockdowns and** are certain to increase going forward. Construction of the Proposed Developments itself will add **pollution and** remove green areas which can help mitigate the pollution. The Local Plan contains no direct mitigants to deal with this problem.

Transport Modelling also includes the development of a new junction for the traffic to/from Proposed Development MD4 – Peel Hall.



Peel Hall – Transport Assessment Appendix 12 - https://www.warrington.gov.uk/sites/default/files/2020-09/appendices_1-20.pdf?fbclid=IwAR2BqfK2UWKp5UifGOe4H3YQNWw5TeVUEWjQF3T2P2hg8WYWTlhvYzJ6uGw

This design places 2 roundabouts close together, where the proposed primary route of traffic would involve people exiting the development taking the second exit. The proximity of these roundabouts will likely cause local queuing due to traffic having to yield priority. It is also undesirable for cyclists, with no dedicated cycling provision being included in the design. This seems to conflict with the objectives specified in Section 3.4 of LPT4 (Warrington Borough Council’s Fourth Local Transport Plan)

The Transport Modelling for Proposed Development MD4 allows for a small increase in traffic towards Winwick along Mill Lane / Delph Lane towards Myddleton Lane. However, it does not give rationale as to why traffic would choose to travel along Blackbrook Avenue towards Birchwood Way vs this route. Given that the Blackbrook Avenue route involves taking the 2nd exit off the new Peel Hall roundabout, and immediately taking the 2nd exit off the Millhouse roundabout, this route will certainly show localised queuing. The alternative of taking the Winwick route via Mill Lane / Delph Lane, which involves the first exit from the roundabout and no signal-controlled junctions, is unlikely to show localised queuing at this point.

Figure 4.1 – Illustrative internal road layout and site access locations



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Pel Hall Transport Assessment - Figure 4.1 (https://www.warrington.gov.uk/sites/default/files/2020-09/1107_peel_hall_transport_assessment_050716.pdf?fbclid=IwAR1vgZSfyYwaSESS6BsFNVu7SpNkiXr5zxaq_56ykjYb-ga3GZE-3cXNDXg)

The figure above illustrates that the roundabout has currently been designed for access by 700 houses. The documentation for development MD4 in the Proposed Local Plan mentions that this roundabout would now be the primary access for the site, used by over 1100 homes. The additional traffic flows from this do not appear to have been considered in the design and will add to the problems illustrated above.

While in discussion with the officers at the Halliwell Jones exhibits, it was mentioned that traffic calming measures would be considered for Delph Lane. However, it is our understanding that the discussions on these have reached an impasse, as the proposed design would impact the farm vehicles that have to use this lane. Due to the restricted width of the lane, measures would result in these vehicles not being able to transit and result in lack of access. No alternative measures meeting the requirements have currently been proposed. This lane has not changed significantly since the 19th Century, contains hazardous bends as well as its restricted width. This causes significant safety issues for vehicles, cyclists and pedestrians.

In addition, in examining SatNav predicted travel time, for journeys involving travel North on M6 towards Haydock, or West on M62 towards St Helens, the Winwick route offers both a shorter distance and currently a shorter travel time. For M62 East and M6 south, the trip via Winwick is longer, but takes approximately the same time, meaning it is a viable route when local congestion at the roundabouts is present.

Predicted Journey times at 8:00AM Monday morning

| Destination | Via Winwick | Via Blackbrook Av |
|-------------|--------------------------|----------------------------|
| M6 North | 2.9 Miles 5 – 8 minutes | 8.4 Miles, 12 – 14 minutes |
| M62 West | 2.4 Miles, 6 – 8 minutes | 2.9 Miles, 7 – 10 minutes |
| M62 East | 6.8 Miles, 10 minutes | 4.6 Miles, 7 – 10 minutes |
| M6 South | 7.3 Miles, 10 minutes | 4.8 Miles, 10 minutes |

Journey details shown in Appendix A

It can therefore be reasonably determined that a significant proportion of drivers will choose to take the Winwick route. This could be because of local queuing leaving the development (due to the proximity of the 2 roundabouts), or when the vehicle is travelling North or West on the motorway network. Traffic measures to limit this will cause lack of access for farming, and no suitable measures have been found at this time to enable this already congested 19th Century lane to safely absorb any additional traffic.

This will cause increased traffic via the A573 Golborne Road and Myddleton Lane junction thus adding traffic flows to an already above capacity junction that has not been factored into the modelling data.. Given its proximity to Winwick CofE Primary School, this will cause additional safety and pollution concerns.

The design of the junction with 2 roundabouts in proximity is likely to cause safety concerns, especially for cyclists, and traffic queues. It also does not promote alternative forms of transport such as cycling as stated in the Local Plan and in contradiction to Policy INF1.

It is not clear whether the traffic modelling has taken account of deliveries of goods to domestic properties arising from the recent escalation in online shopping. This trend shows no sign of abating and will inevitably result in a further significant increase in traffic to and from the additional 1330 properties proposed in OS6 and MD4.

Section 3: Suitability of Land at OS6

The Options Technical Assessment document, Page 73 states the following about site Proposed Development site OS6:

This site is considered to be suitable – unlikely to have a major impact on trends. There are some suitability issues due to the distance to GP services and local natural greenspace however the site has good accessibility to formal play space, and primary and secondary schools. The site also falls within zone 1 (inner protection zone) of the Environment Agency’s Groundwater Source Protection Zone, it contains a small area of potentially contaminated land and is within a historic landfill site 250m buffer zone. The site appears to be available, as it is not in active use and it was promoted by the owner. The site may be achievable as it is in an area of moderate viability and there is developer interest and known demand. However, there is a small section of potentially contaminated land in the north eastern corner and a section of historic landfill site buffer zone in the south western corner, and therefore, there are known abnormal development costs.

Workshop Comments

The site adjacent to the settlement of Winwick, located to the immediate north of the settlement. The site is considered to be in a sustainable location and it is available being free from ownership issues, having been promoted by the site owner. The site may be achievable although there are known abnormal development costs with a small area of potentially contaminated land in the north-eastern corner and a section of historic landfill site 250m buffer zone in the south-western corner of the site, however it is possible that these areas could be avoided. There are also pylons running across the site however these could be avoided given that the site exceeds the housing requirement for Winwick. In addition, it has been judged to be unlikely to have a major impact on trends and be a suitable site. As such, development of the site would be in accordance with the objectives as set out in the draft Warrington Local Plan, particularly W1 to strengthen existing neighbourhoods, W2 which seeks to facilitate the sensitive release of Green Belt land, W4 to promote sustainable modes of transport, and W6 to minimise the impact of development on the environment. There is potential that the site could accommodate some employment development and although the existing boundary is less durable, a more durable Green Belt boundary could be established.

Options Technical Assessment – Page 73 - https://www.warrington.gov.uk/sites/default/files/2021-09/development_options_and_site_assessment_technical_report_-_september_2021_0.pdf

On Page 23 of the Proposed Local Plan, the following statement is made

3.1.13 As we invest in infrastructure, we also need to recognise there is a need for a transformation in the way people move around Warrington and travel into and out of the Borough. The Local Plan closely reflects the Council’s new Local Transport Plan (LTP 4) to ensure that growth over the Plan Period and beyond is supported by new transport infrastructure and services which reduce the reliance on the private car by promoting walking and cycling, whilst at the same time ensuring that the existing transport network is safe and efficient. This is the only sustainable way to address the travel issues experienced in Warrington and such an approach will have major environmental benefits. It will also promote active and healthier lifestyles and ensure that everyone is able to easily get to where they live, shop, study, work and access local services.

Policy INF1 – Sustainable Travel & Transport states:

To deliver the Council objectives of improving the safety and efficiency of the transport network, tackling congestion, reducing carbon emissions and improving air quality, promoting sustainable transport options, reducing the need to travel by private car and encouraging healthy lifestyles, the Council will expect development to: 1. General Transport Principles: a. Be located in sustainable and accessible locations, or in locations that can be made sustainable and accessible; b. Ensure priority is given to walking, cycling and public transport within its design, and reducing the need to travel by private car;

As stated in Section 1, access to Primary schools is likely to be limited given the capacity constraints at the local school. Therefore, access to both Primary and Secondary schools would likely be by private car, as would access to shops, healthcare and other services. Estimated journey times are shown below:

| | Small Supermarket | Large Supermarket | GP Surgery | Primary School |
|------------------------|-------------------|-------------------|------------|--|
| Distance | 1.6 miles | 3.3 miles | 2.5 miles | 2.4 miles |
| Walking Time | 32 mins | 1 hr | 47 mins | 40 mins |
| Public Transport Time* | 15 mins | 26 mins | 22 mins | 34 mins Requires 29 mins of walking |
| Cycling Time** | 8 mins | 17 mins | 12 mins | Not Appropriate |
| Private Car Time | 7 mins | 14 mins | 10 mins | 9 mins |

Primary school is the nearest alternative to Proposed Development OS6, Callands Community School. Public Transport times are best case. There are no current or proposed cycle lanes in the vicinity of the Proposed Development OS6, and most routes require navigating 2 roundabouts. These used by motorway traffic and are on 40mph roads, meaning cycling would not be appropriate for children.

At current pricing, a day bus ticket for an adult is approximately £5, with a family ticket costing around £10. This compares to a cost for the car journey of less than £1.

These figures clearly illustrate that public transport accessibility for this site is limited, and always takes longer than private car with a significantly higher cost. Without significant investment in cycling infrastructure, journeys by bike involve navigating busy junctions unsuitable for children. Therefore we believe the selection of this proposed site is in direct contradiction to the goals of the Local Plan and Policy INF1.

It is noted in the Site Assessment that the site is within the buffer zone of historic landfill and has a potentially contaminated area. ***Given that the site is also within a Groundwater Protection Zone Level 1, development of this site has a high potential to not only contaminate drinking water supplies from building activity but also with contaminants from these areas.***

In the Duty to Co-operate statement, it is noted on Page 13 that a meeting took place with United Utilities:

Dealing with United Utilities Local Plan representation: It was agreed that the principles of United Utilities response (17/06/2019) to the Council's PSVLP would be reflected by WBC in the proposed modifications that it will be submitting, requesting that the Inspector accepts the modifications. This will ensure consistency with national policy and afford protection to strategic assets and infrastructure owned and operated by United Utilities.

Outside of the main development area modifications, as requested to policies MD1, MD2 and MD3, the allocated site OS9, Winwick, was discussed in further specific detail, given its proximity to Winwick Service Reservoir and being within Groundwater Source Protection Zones (GWSPZs) 1 and 2.

United Utilities first preference is that no development takes place in groundwater source protection zone 1. That said, if the council is minded to continue with the allocation, there is no objection in principle to site OS9. United Utilities wishes to

Duty To Co-operate statement – Page 13 - https://www.warrington.gov.uk/sites/default/files/2021-10/duty_to_co-operate_statement_update_-_september_2021.pdf

These notes mention a site OS9, of which there is no mention in the Proposed Local Plan. Therefore, there is no evidence presented that discussion took place with United Utilities over this particular site OS6. Even with this omission, United Utilities clear preference is for no development within GWSPZ 1 and 2 areas.

It is also noted that the land has 2 electricity pylons located within it, but this is dismissed as the houses can avoid them. A 2007 Cross-Party Inquiry into Childhood Leukaemia and ELF EMF found:

We recommend that Government:-

1. Recognise the potential risks to children's health caused by exposure to EMF and introduce a moratorium on the building of new homes and schools within at least 60 metres of existing High Voltage Overhead Transmission Lines (HVOTL) of 275 kV and 400 kV and on the building of new HVOTL within 60 metres of existing homes and schools and the same within 30 metres from 132 kV, 110 kV and 66 kV lines. The Inquiry also recommends that the Government consider the case for extending this distance to 200 metres for the highest voltage lines and pro-rata for lower voltages.

Source - Executive Summary – Page 9 -

https://www.rochford.gov.uk/sites/default/files/planning_evibase_eb38.pdf

A significant number of houses in this development would be within this zone. Although the Government did not act on these recommendations, allowing such a development may jeopardise the health of residents living in these houses, especially given that many these would likely consist of families.

Section 4: Impact on Historical Assets

WBC Policy DC2 states

2. Particular consideration will be given to ensure that the significance of those elements of the historic environment which contribute most to the Borough's distinctive identity and sense of place are not harmed. These include, but not exclusively:

- a. Evidence of Roman activity such as the settlement at Wilderspool and the roads at Appleton and Stretton.
- b. Moated sites, country houses, farmhouses and associated outbuildings in the countryside including Bradley Old Hall, Barrow Old Hall and Bewsey Old Hall.
- c. The site of the Battle of Winwick, also known as the Battle of Red Bank, now a registered Battlefield.

Proposed Local Plan – Page 118

The Proposed Development OS6 is immediately adjacent to the site of The Battle of Winwick Pass (19th August 1648). This is of historic importance in that it proved the decisive battle in the Second Civil War, which ultimately led to our current form of democracy. It is particularly significant because it is considered by Historic England to be the only English battlefield of that war which remains in a good state of preservation. It is also believed to possess substantial overall archeological potential.

The Heritage Impact Assessment for Outlying Areas states for Proposed Development OS6

DEFINITION OF AREAS The registered area is set out on the attached plan. As is standard practice with the Battlefield Register, the area is drawn to follow modern boundaries wherever possible. The boundary has been drawn to exclude, as far as possible, areas of later development.

The northern part of the battlefield includes the location of the engagement between the two forces, and their probable lines along the northern and southern edge of the valleys of the Newton and St Oswald's brooks. Here the boundary mainly follows modern property boundaries and the boundary between St Helen's and Warrington.

The eastern boundary is formed by the western edge of the A573 (Golborne Road). This area includes the probable route of the parliamentary cavalry during its flanking manoeuvre.

Heritage Impact Assessment for Outlying Areas – Page 33 - <https://www.warrington.gov.uk/sites/default/files/2021-09/Heritage%20Impact%20Assessment%20for%20the%20Outlying%20Settlements%20-%20August%202021.pdf>

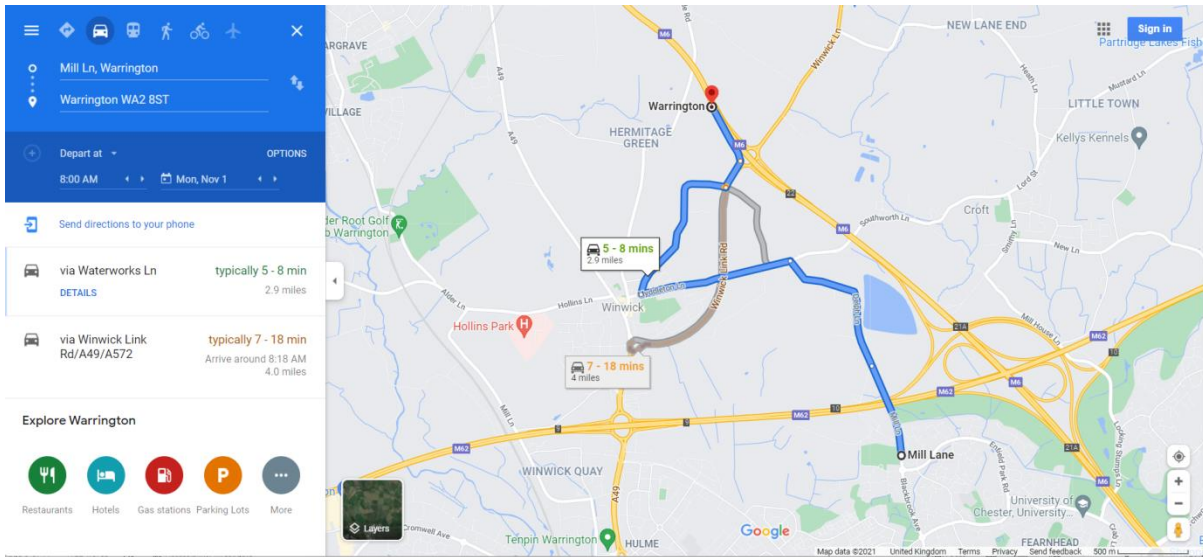
As stated in the above assessment, the registered battlefield area is drawn to follow modern boundaries, of which the A573 (Golborne Road) is one. However, there is a high likelihood that the area in question also comprised part of the battlefield.. As matters stand, Warrington Borough Council have done nothing to commemorate the battle or even erect signage to acknowledge its existence in complete contrast to the approach of other Authorities to sites of similar historic importance. This Proposed Development OS6 seeks to create 130 new dwellings immediately

alongside the battlefield site in green belt land with no mitigation at all for the the detriment to our Heritage Assets.

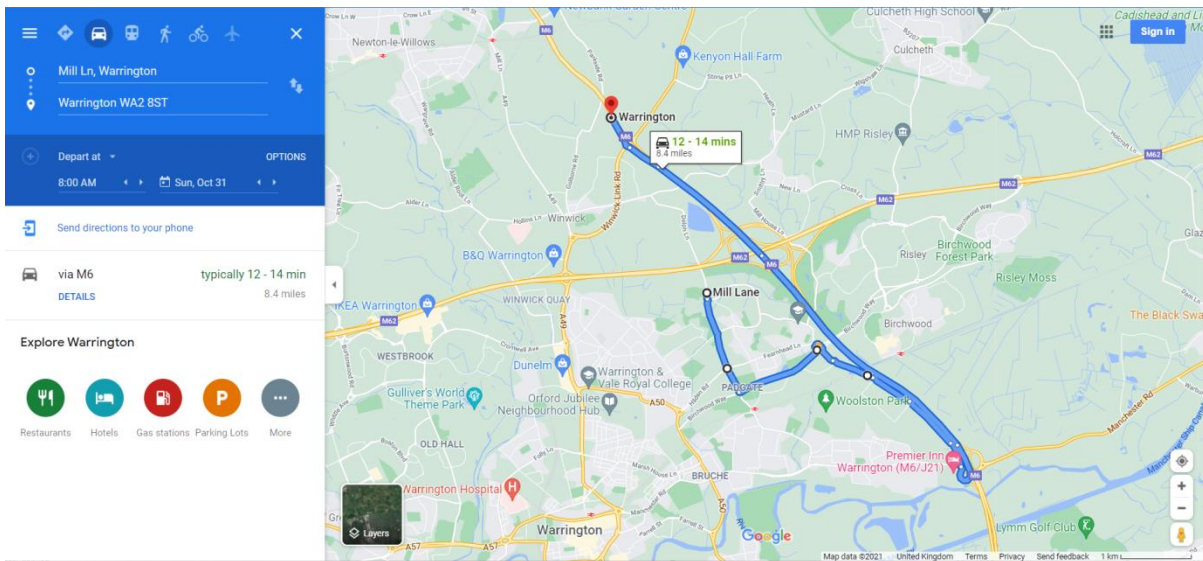
Being this close to the established battlefield will also change the character of the area, from one that is primarily rural to one that has a character of a modern town.

Therefore, the inclusion of Proposed Development OS6 goes against the aims of Policy DC2 in protecting our historical assets for future generations and the site should not be considered for development until a thorough archaeological survey has been completed

Appendix A: Travel Time Details from Proposed Development MD4



M6 North via Winwick



M6 North via Blackbrook Av



M62 West via Winwick / via Blackbrook Av



M62 East via via Blackbrook Av



M62 West via Winwick



M6 South via Blackbrook Av



M6 South via Winwick

Appendix B: List of residents supporting this document

The below list of individuals reviewed this response and indicated via an electronic form their support of this document. More detailed information is available on request from:

Andrew Griffiths

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email: [REDACTED]

Stuart Mann

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email: [REDACTED]

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| A Macfarlane | [REDACTED] |
| A Mcguire | [REDACTED] |
| Aaron Smith | [REDACTED] |
| Ada Parkinson | [REDACTED] |
| Adam Jones | [REDACTED] |
| Adam Shaw | [REDACTED] |
| Adam Thomas | [REDACTED] |
| Adam Walker | [REDACTED] |
| Alan bate | [REDACTED] |
| Alan Hitchen | [REDACTED] |
| Alan Peter Parkinson | [REDACTED] |
| Albert Walker | [REDACTED] |
| Alexander Norris | [REDACTED] |
| Alexandra Greaves | [REDACTED] |
| Alexandra L Neal | [REDACTED] |
| Alice Barker | [REDACTED] |
| Alice Macfarlane | [REDACTED] |
| Alice Walker | [REDACTED] |
| Alison Eden | [REDACTED] |
| Alison Maria Hazell | [REDACTED] |
| Alison Owens | [REDACTED] |
| Allan Jones | [REDACTED] |
| Amelia Davies | [REDACTED] |
| Ami Grierson | [REDACTED] |
| Ami Grierson | [REDACTED] |
| Amy Bateson | [REDACTED] |
| Amy Bethell-Clarke | [REDACTED] |
| Andrea Cookson | [REDACTED] |
| Andrea James | [REDACTED] |
| Andrew Fahey | [REDACTED] |
| Andrew Griffiths | [REDACTED] |
| Andrew Waine | [REDACTED] |
| Andy Craig | [REDACTED] |
| Andy Lever | [REDACTED] |

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| Jayne Shaw | |
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| Lois Unsworth | ████████ |
| Lorraine Newton | ████████ |
| Louise Farrington | ████████ |
| Louise Whalley | ████████ |
| Luca Edwards | ████████ |
| Lucy Bellamy | ████████ |
| Luke Herron | ████████ |
| Luke sharples | ████████ |
| Lynda King | ████████ |
| Lynden James | ████████ |
| Lynn Bright | ████████ |
| Lynn Hitchen | ████████ |
| M Hilton | ████████ |
| Malcolm Boniface | ████████ |
| Margaret Bunting | ████████ |
| Margaret Hart | ████████ |
| Margaret Mather | ████████ |
| Margaret McColgan | ████████ |
| Margart Fairhurst | ████████ |
| Maria Shaw | ████████ |
| Marian Norris | ████████ |
| Marie Segar | ████████ |
| Marilyn Barrow | ████████ |
| Mark Clarke | ██████████ |
| Mark Fearn | ████████ |
| Mark Hughes | ████████ |
| Mark Robinson-Field | ████████ |
| Mark Thorpe | ████████ |
| Marlene Harris | ████████ |
| Marlene Herron | ████████ |
| Martyn Willetts | ████████ |
| Mary Burke | ████████ |
| Mary L Hodge | ████████ |
| Mary Leigh | ████████ |
| Massimo Leotardi | ████████ |
| Mathew Dutton | ████████ |
| Mathew Ian Jackson | ████████ |
| Matt Hayden | ████████ |
| Matthew Bowden | ████████ |
| Matthew carey | ████████ |
| Matthew Crozier | ████████ |
| Matthew Evans | ████████ |
| Matthew lawless | ████████ |
| Maureen Chadwick | ████████ |
| Max Steele | ████████ |
| Maximilian Peters-Greaves | ████████ |
| Maxine Ghee | ████████ |
| Megan Kavanagh | ████████ |
| Megan Robinson | ████████ |
| Melissa Shaw | ████████ |
| Mia Parkinson | ████████ |
| Michael Higginson | ████████ |

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| Michael Lowe | ████████ |
| Michele Cook | ████████ |
| Michelle Isherwood | ████████ |
| Milky evans | ████████ |
| Miss Cheryl Weedon | ████████ |
| Movita Altess | ██████████ |
| Mr Christopher Weedon | ████████ |
| Mr edward keefe | ████████ |
| Mr Mark Weedon | ████████ |
| Mrs bernadette keefe | ████████ |
| Mrs Philadelphia Anne Weedon | ████████ |
| Mrs Wendy Weedon | ████████ |
| Natalie Dunn | ████████ |
| Natalie Rowe | ████████ |
| Nathan Dunn | ████████ |
| Nathan Farrington | ████████ |
| Neil Aspinall | ████████ |
| Neil Cook | ████████ |
| Neil Radley | ████████ |
| Nicholas Barker | ████████ |
| Nicholas Bayley | ████████ |
| Nick Bayley | ████████ |
| Nick phillips | ████████ |
| Nicola Baker | ████████ |
| Nicola evans | ████████ |
| Nicola Harding | ████████ |
| Nina Dunwoody | ████████ |
| Noel Dorr | ████████ |
| Oliver Parkinson | ██████████ |
| Oliver Thomas | ████████ |
| Olivia Horne | ████████ |
| Oscar Robinson | ████████ |
| Patricia Harrison-Lee | ████████ |
| Paul cunliffe | ████████ |
| Paul Fox | ████████ |
| Paul Harrop | ████████ |
| Paul Healey | ████████ |
| Paul Hicken | ████████ |
| Paul Taylor | ████████ |
| Paul Wharton | ████████ |
| Paula Kavanagh | ████████ |
| Pauline Parr | ████████ |
| Peter Clarke | ████████ |
| Peter Harrison-Lee | ████████ |
| Peter IDDON | ████████ |
| Peter J Hodge | ████████ |
| Peter M McGeachin | ████████ |
| Peter Malcolmson | ████████ |
| Peter Vernon | ████████ |
| Philip Hicken | ████████ |
| Philip James Hazell | ████████ |
| Philip James Smith | ████████ |
| Philip Parkinson | ████████ |

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| Philippa Hughes | ████████ |
| Phillip Vernon | ████████ |
| Philo Chadwick | ████████ |
| Phoebe iddon | ████████ |
| Polly iddon | ████████ |
| Poppy Mai Jackson | ████████ |
| R Fairhurst | ████████ |
| Rachel Boyle | ████████ |
| Rachel Goode | ████████ |
| Rachel Walker | ████████ |
| Rachel Wharton | ████████ |
| Rebecca Cookson | ████████ |
| Rebecca Blackhurst | ████████ |
| Rebecca glover | ████████ |
| Rebecca Jane Aspinall | ████████ |
| Rebecca Robinson | ████████ |
| Reece Thorpe | ████████ |
| Richard glover | ████████ |
| Richard Harris | ████████ |
| Richard Mawdsley | ████████ |
| Richard Whalley | ████████ |
| Robert Altess | ██████████ |
| Robert Bolton | ████████ |
| Robert Leighton | ████████ |
| Robert Leslie Towers | ████████ |
| Robert sharples | ████████ |
| Robert Shaw | ████████ |
| Robyn Harrison | ████████ |
| Rodney browne | ████████ |
| Roger Parr | ████████ |
| Rory Pritchard | ████████ |
| Roxanne Williams | ████████ |
| Ruby Jones | ████████ |
| Ruby Sahota | ████████ |
| Ruth Adam | ████████ |
| S Battye | ████████ |
| Sally Jones | ████████ |
| Sam iddon | ████████ |
| Sam Johnstone | ████████ |
| Samantha Green | ████████ |
| Samantha Roberts | ████████ |
| Samuel Bradford | ████████ |
| Sandra kavanagh | ████████ |
| Sara Smithson | ████████ |
| Sarah Boniface | ████████ |
| Sarah Browning | ████████ |
| Sarah Dowdeswell | ████████ |
| Sarah Eden-Heyes | ████████ |
| Sarah Gardner | ████████ |
| Sarah Robinson | ████████ |
| Scott evans | ████████ |
| Scott Williamson | ████████ |
| Sean Smart | ████████ |

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| Sharon Irene Liddiard | |
| Sharon mchugh | |
| Sheila Rylance-Perks | |
| Simon Eden | |
| Simon sharples | |
| Sofia Main | |
| Sophie Charnock | |
| Sophie Turnbull | |
| Stella M McGeachin | |
| Stephen houghton | |
| Stephen McManus | |
| Steven Crozier | |
| Stewart Eden | |
| Stuart Mann | |
| Stuart whittle | |
| Susan Harris | |
| Susan Harrop | |
| Susan Jackson | |
| Susan Langhorne | |
| Susan Sproston | |
| Suzanne Craig | |
| Suzanne Morley | |
| Terry Dunn | |
| Thea Whalley | |
| Thomas Baker | |
| Thomas Boniface | |
| Thomas Ghee | |
| Thomas Herron | |
| Thomas rigby | |
| Tim Iddon | |
| Tina Dutton | |
| Tracy Sheriff | |
| Tristan Robinson | |
| Tylah Cliffe | |
| Valerie Linda Parkinson | |
| Valerie Vernon | |
| Vicky lawless | |
| Victoria Benson | |
| Victoria Brathing | |
| Victoria Neimarlija | |
| Walter Taylor | |
| Warrington Action Against Inappropriate Development | |
| Wayne Heath | |
| Wendy Rennison | |
| Wesley david hunter | |
| William Shaw | |
| Yvonne Chadwick | |
| Yvonne Clarke | |