

Proposed Submission Version Local Plan

PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

Name of person completing the form: Geoff Settle

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

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	Public Advisor Liverpool/Lancaster Uni
Agent name (if applicable)	-
Address 1	-
Address 2	-
Postal Town	-
Postcode	[REDACTED]
Telephone number	-

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Plan as a whole

2. What does your comment relate to? Please select one option.

Both 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).

5.1, 8.3, 8.4, 8.6, 9.2, 10.3, 10.4, Appendix 5

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

	Yes	No
Legally Compliant		
Sound		X
Compliant with the Duty to Co-operate		

4. If you have answered 'No' to any of the options in the above question then please give details in the box below 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.

8.3 and 8.4 Warrington's Green Infrastructure Network, Biodiversity & Geodiversity.

a. Green Wildlife Movement Corridors - recommendation

From a wildlife connectivity and increase in biodiversity point of view I am pleased in general with the content, but I would like to see additional detail and emphasis on developing green wildlife movement corridors being created and maintained so that they can also be incorporated in developments and throughout and across the borough like rights of way.

It would be ideal if this borough could work with its neighbours to enable wildlife to move between . Wildlife does not know about political and human constructed boundaries and mustn't be stopped in their tracks because of our shortcomings.

Further need to enable wildlife to feeding areas with the help of intelligent planting of hedgerows, trees, and the creation of small wetlands, along with the promotion of new wildlife sites. This was done on one new development in Croft- they should not be an afterthought.

I believe that green wildlife movement corridors should be identified upfront in maps and committed to and respected by developers depending on the location.

b. Trees and unauthorised felling of TOP

At the moment some developers fell trees prior to applications, and I am grateful to Simon Twigg in helping stop this across, but some are just too quick.

Whilst Natural England have been consulted and that is great, has the same been done with our partners Mersey Forest, Mersey Gateway Environmental Trust, Cheshire Wildlife Trust and Warrington Nature Conversation (all of except Cheshire I have served on boards), and their views taken on board, their visions, skills, five year or 20 year plans and experience can be a real asset to WBC.

I believe it is essential to have this approach embedded in the local plan ahead of any developers plans being submitted for approval.

I know funding cuts have been imposed and partners contact reduced or severed but can this be reinstated as a massive amount of knowledge and experience has been lost – not mention the loss the Borough's Environmental Officer which placed a huge did in WBC.

Yes we have contracted out to the GMEU and they have their strengths but we did have someone who lived and breathed wildlife in the Town and championed its survival, protection and future.

Ecological networks and wildlife sites are so important for maintaining and increasing biodiversity every effort must be made to do so and we should take action when we have to not just have written policy it must be enforced before it is too late.

So, to re-iterate can there be a map of where these green movement corridors are so that developers can referenced them when drawing up their outline plans?

Once their work starts, we don't want them concreting them over or destroying them prior to submitting their planning applications.

8.6.11 Designing out crime and designing in community safety should be central to the planning and delivery of new development....

Well is hasn't worked in Peel Hall Park – a teenage play area has stood empty for years following numerous arson and other damage.

Or is it just a place where lessons have been learnt and forgotten? It needs to be replaced with your robust secure design – at least the kiddies play area is standing up better.

8.6.15 Brownfield sites

The Local Plan envisages that substantial brownfield re-development will take place in the town centre. Has New Town House been included in the count?

Andy Farrell once told me that the Cockhedge Centre would be demolished along with NTH is there any chance soon of the later taking place?

On his wall he had plans for development opposite Central Station towards the HJ stadium – the development was to include heating from a sinc underground and a system to distribute the heat through out the complex for residential properties and commerce.

Have those plans been ditched or is there anything in the design that could be used across Warrington and used as prompts for prospective developers?

Does our innovation stretch this far with renewable energy?

9.2 Policies Relating to Objective W6 – Flooding prevention

Warrington has been helped tremendously by the Environmental Agency at Victoria Park and Spittle Brow to develop flood defenses that have worked.

This policy appears to be like others putting the emphasis on the developer for the solutions that WBC will scrutinise. This relies on their 'experts' we need to be very robust in our strategy.

The two I mention have held back the waters but they are retrospective builds, Do we have the skills as a council to vet and scrutinise what is going on?

The Peel Hall rule six party has raised flood issues at the public Inquiry with a developer that has taken 30 years to get planning permission, if he's taken this long what hope have we in his ability to sort out the hydrology issues identified by David Sawyer and sent in in Jim Sullivan's evidence to the local plan.

10.3 Fiddlers Ferry

The space is within the area of influence of the Mersey Gateway Environmental Trust set up to oversee monitor, manage, research, and develop project from an Environmental Point of view the Upper Mersey Estuary. I recall the toxic chemicals the bridge builders found when they were sinking the bridge supports – maybe similar problems will be experience further down the road at Fiddlers Ferry. There need to be things in place to protect the wildlife from any disturbance that brings underground to the surface.

Importantly the MGET has good links to research and environmental projects that came out of it and probably still do. They are partners with a number of Universities in the region and doing great work for Halton, something that could be very useful especially in developing the lagoon and other areas, as well as potential all the way to Woolston Weir. The Warrington Nature Conservation Forum used to use the Fiddlers Ferry Educational facilities for our meetings – a very useful place to keep and develop to promote Warrington's green activities.

Additional comments about Fiddlers Ferry Western Link from a member of Warrington Nature Conservation Forum reads:

Fiddler's ferry currently provides valuable wildlife habitat in its ash settlement areas. If another country park is proposed would that mitigate the habitat lost?

Plus if memory serves the power station provides water for the Sankey canal? Have to check that one. Has sufficient nature conservation been built into the plan? or any for that matter.

A nature conservation and enhancement plan needs to be included in the overall scheme. Last time many schemes e.g the Western link hadn't even been environmentally risk assessed before development approval was granted.

Regards

David Nowell

10.4 Peel Hall Unsound

a. Embedded Plan

I felt aggrieved from the time that the Local Plan was on show at the HJ stadium. To see Satnam's plans embedded in the Local Plan.

It appeared to be the start of WBC supporting it.

Come the public inquiry only the infrastructure was fought over the rest was agreed as okay.

No interest was shown about the other issues such as Traffic Noise and Pollution, environment and wildlife. It became clear that it was just a numbers game and we have been left with a sow's ear of a plan.

If it hadn't been for the Rule Six Party that half the conditions would not have been realised.

b Air Quality and Noise.

I still stand by my submissions that the site is too close to the M62 because of traffic noise and poor air quality. It alongside, a Warrington Air Quality Management Areas (AQMA's). One of several 50meter strip of polluted air that skirts the borough, M6, M62, M56 – their needs to be exclusion zones for no build in these areas. Peel Hall is alongside maybe even in such a zone.

At a recent Public Advisers Forum that I attended as a public adviser - Professor Ian Sinh described the damage that the modern-day traffic pollution does to young lungs by the toxic invisible cloud and the impact and reduction in life expectancy that will result. The particulates involved cannot be seen by the human eye, but they can penetrate and damage lungs.

I produced a table of my readings at the recent Planning application Mill Lane 27 Homes 2021/39462 to build 27 homes in Houghton Green which are only 34m away are in from that zone and WBC were recommending approval!

You have heard of the nine-year old Ella Adoo-Kissi-Debrah who died from an asthma attack and became the first person in the UK to have air pollution listed as a cause of death. That could happen to young Peel Hall residents.

As well as polluted such places they are extremely noisy. I have recorded figures at and above 85dBs on my sound meter at the planning application for the 27 homes in Mill Lane which is becoming classified as a danger to hearing.

These were taken opposite to the Peel Hall fields which also run alongside the motorway in the contiguous 50 meter, AQMA and also in the direction of the motorway bridge and the plot of land behind the Plough Public Car Park that is for sale.

The Peel Hall projections by Satnam for the site, has three story homes that back onto the M62 with windows that don't open – this is insanity, once you go outside the pollution and noise hits you smack in the face.

There are many other issues of flooding, wildlife that needs to be protected. The RHODIS database has been replaced and it will be interesting what the analysis now shows as new data may well have been captured by the new system.

It's taken a young graduate from Houghton Green to highlight from his garden records of birds and moths that I highlighted.

I'd love it to have seen the green fields of Peel Hall kept and developed as a green field/wildlife site, but it looks like the inquiry by Michael Grove has put the kibosh on the thought of more trees in the Mersey/Northern Forest.

From my time on the Mersey Forest I have seen the plans they have over the many decades flourish and the educational work be second to none across Warrington and beyond but I think that Andy Farrell put pay to that with his budget reduction drive - Warrington Nature Conservation, Mersey Forest and Cheshire Wildlife Trust partnerships all in the name of a few pennies forsaking the expertise, co-operation – this is a big concern to me as was the exit of the Environmental Office – Helen Lacy -you gave away a real gem there. I know these are not directly linked to this section but they are related as for example the Mersey Forest had tree planting for Peel Hall in mind.

And the Noise Barrier – bunds -they need to be sustainable and should be fully tested prior to any build. The ones where I live – built during the New Town era are built with natural and sustainable earth with a woodland that has grown up during the last 50 years and works well with reference to my sound meter – and don't get me started on the subject.

WBC seem to be reliant on developers for reports finding and expertise, but perhaps that's the way planning in local government is today? and findings!!!!

C. Traffic networks around Peel Hall Unsound

There are massive issues about traffic and in the local plan proposal appears to come out at or near the Mill House. Delf lane is a country lane and too narrow in places near the corner and in front of the White Cottage where wing mirrors are removed as vehicles hit each other.

At peak times and schools runs queues build up not in just Poplars but also in Houghton Green and Cinnamon Brow. These queues occur on Enfield Park Road, Crab Lane (past the University of Chester - Padgate Campus that will soon become a brownfield site and bring more traffic on the local network) as well as Blackbrook Ave at peak times. 1200 homes are proposed, and this is going to have a massive impact on the road network. Additionally, Padgate Campus sale will bring forth additional issues TRAFFIC is a big issue that wasn't resolved during the Inquiry and hasn't gone away.

Question, Why do planning experts find traffic tough to resolve in Warrington. Answer, traffic issues are so complicated and have been for decades it's a mind field. Section 2.1.57 says that ownership is 81%. This is an extremely high figure indeed and a major problem to overcome. The site is land locked and exit into Poplars makes it unsound. There were so many different issues about the traffic model during the Inquiry and made worse in my mind by the Inspector going on a tour of the road network during the pandemic or at least when people were not travelling because of its effect. Now is the time when the flow has built back to previous numbers prior to the pandemic. The previous inspector didn't have that problem and that was reflected in his report. It's just unsound.

10.4.8 Unsound - The Peel Hall site performs well in terms of the assessment against the Objectives of the Local Plan, the requirements of the Government's National Planning Policy Framework and the Local Plan's Sustainability Appraisal. I would disagree with his statement it is unsound with respect to the above and the evidence of the Rule six party that was presented to the Inspector.

Appendix 5: I couldn't find Old Peel Hall mentioned in the Historic List. It is buried underneath the earth near Peel Hall Farm and recognised by Cheshire records as historical interest. It is something that needs to be carefully managed during any future development should that occur. It was mentioned during the Peel Hall Inquiry.

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.

Peel Hall should be withdrawn - or at least a good attempt at doing so. The acceptance of it I think has an impact across the patch. Wildlife issues need to be addressed ahead of any development so that potential developers know what they can and can't do, their contributions should be making Warrington a good place to live, work and prosper in and enjoy the surroundings for a sustainable and secure environment.

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.

Yes, I wish to participate at the oral examination

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

I have made observation during this and previous draft and I don't think that they have been incorporated or commented on.

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**