

# 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:** James Sullivan

**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 group or organisation

3. Please provide your contact details:

|  | Contact details                         |
|--|---|
| <b>Organisation name (if applicable)</b> | Rule 6 party to the 2020 Public Inquiry |
| <b>Agent name (if applicable)</b>        | -                                       |
| <b>Address 1</b>                         | -                                       |
| <b>Address 2</b>                         | -                                       |
| <b>Postal Town</b>                       | -                                       |
| <b>Postcode</b>                          | -                                       |
| <b>Telephone number</b>                  | -                                       |

## 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.

MD4 Peel Hall

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).**

MD4

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

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

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.

Legal objections:

Paragraph 2.9 in the WBC Statement of Community Involvement states that:

2.9 The Council will give notice of the intention to commence work on the preparation of an update to its Local Plan or a more detailed Local Plan document as soon as it is clear as to its scope, purpose and timetable. At this point the Council will also invite consultees to make representations about the proposed content of the Local Plan Document. This will be done by direct notification of all consultees listed in the Statement of Community Involvement. The Rule 6 Party spent over 12 months alongside the WBC representatives at the Peel Hall planning inquiry and yet there was absolutely no attempt by WBC to involve the Rule 6 Party as a consultee in the period before the revised local plan was released for public scrutiny.

Paragraph 1.19 in the Statement of Community Involvement states that:

1.19 The Localism Act introduced new powers to allow local communities to prepare 'Neighbourhood plans' and 'Neighbourhood development orders' to guide the future development of their areas. In the 'parished' parts of Warrington, this responsibility rests with the Parish or Town Council. In 'un-parished' areas a Neighbourhood Forum needs to be established and approved by the Council to undertake Neighbourhood planning. None of these actions have ever taken place with respect to the areas where the individual members of the Rule 6 Party currently reside.

The soundness of the proposed development at Peel Hall is opposed by the Rule 6 party on multiple grounds. Members submitted representations concerning Transport, Air Quality, Noise, Hydrology, Climate Change and Ecology. Details of each of these submissions is attached through an upload link as agreed with Michael Bell, Planning Policy and Programmes Manager at Warrington Borough Council.

If Peel Hall remains in the Local Plan following this consultation process then we formally request that all of this material is made available to the inspector.

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 removed from the Local Plan. It is objected to by an overwhelming majority of local people, principally because we can see that the plan is not achievable without damaging local communities.

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:**

The Rule 6 party is an equal party to the Public Inquiry which was held in 2020, and represents a significant number of people in Warrington.

We would be happy for any member of the group to be invited to represent the group.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Local Plan consultation - letter from Peel Hall Rule 6 party.pdf - [REDACTED]

**Comments/file description**

We have uploaded here only a brief letter. The substantive part of our submission is has been emailed directly to [REDACTED] with the title Peel Hall Rule 6 party submission to Local Plan consultation

You have just completed a Representation Form for MD4 Peel Hall.

Please select what you would you like to do now?

Submit response ( I am a Developer / Landowner / Group / Organisation)



12<sup>th</sup> November 2021

**Peel Hall**

Dear Sir

**We are the members of the Rule 6 Party who recently took part in the Peel Hall planning inquiry on behalf of the Peel Hall Action Group and the many hundreds of our supporters living in the north of Warrington. We request the permission of the inspector to continue to represent our supporters at the forthcoming planning inquiry into the revised local plan for Warrington. We object to the inclusion of Peel Hall in the revised local plan on the following grounds:**

- (a) Soundness - the inclusion of Peel Hall in the revised local plan is neither justified nor effective.**
- (b) Legal - the complete lack of community involvement and discussion with the Rule 6 Party in the period leading up to the release of the revised local plan for public scrutiny goes against the legal requirement to involve local action groups as set out in WBC's Statement of Community Involvement.**

**We enclose for your attention the Proofs of Evidence and Addendums that we submitted to the Peel Hall planning inquiry in support of our position.**

**Soundness**

1. We note that the most recent appeal has favoured the developer, which might be considered to indicate that the site should be included in the Local Plan. However, we hope and trust that Warrington Borough Council will oppose this decision. If the council is successful in opposing the decision but leaves Peel Hall in the Local Plan, this will open the door to future challenges from the developer
2. The proposed development at Peel Hall would cause significant negative impact on the existing community, with the most notable damage being caused by increased traffic congestion, increased flood risk and increased incidence of ill-health caused by poor air quality. These are known harms and the Council should not encourage or allow building which would lead to such harms.
3. At the time of the Public Inquiry into Peel Hall the outcome of the Parkside appeal was not known. Indeed, Parkside was not taken into consideration. Additionally, the planned development at the University site on Crab Lane was not known about or taken into consideration. These developments will all further add to excessive car usage, congestion and harm to local residents.

Legal

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Paragraph 1.19 in the Statement of Community Involvement states that:

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None of these actions have ever taken place with respect to the areas where the individual members of the Rule 6 Party currently reside.

There is overwhelming local opposition to the proposed development at Peel Hall, as the previous two consultations processes demonstrated. The nature of this consultation process is such that a much lower response rate is expected. We request that the narrative responses from citizens from at least the previous consultation process should be made available to the planning inspectorate so that the strength of local feeling can be gauged.

Signed:

Wendy Johnson-Taylor

Margaret Steen

Jon Parr

David Sawyer

Geoff Settle

Stephen Dodd

Jim Sullivan