



WBC Proof of Evidence - **Rebuttal**

Transport

Produced by Jon Parr
Rule 6 Party
Peel Hall - APP/ M0655/W/17/3178530

Transport

WBC Proof of Evidence Rebuttal

- 1.1 The following document is a review and rebuttal of information provided by Warrington Borough Council (referred to as WBC herein) – Mike Taylor PGDip.
- 1.2 The Rule 6 Party are largely in agreement with the information presented by Mr Taylor which concludes that the appellant has not provided enough satisfactory evidence that the impact of the proposed development would not be severe. Below are a series of concerns over the VISSIM model and its impact on air quality and noise that we believe has not been adequately and robustly challenged by WBC.
- 1.3 Para 2.3 states that it is anticipated that the base modelling may be agreed later this week. The Rule 6 party do not appear to be involved or up to speed with any discussions, all of which are relevant to our proofs of evidence and rebuttals.
- 1.4 Para 2.5 makes reference to queue lengths within the model not representing those in the real world situation and those that residents experience on an all too regular basis. We are therefore confused as to how proposed mitigation can be agreed by both WBC and Appellant.
- 1.5 Para 2.6 states that the VISSIM model is not yet agreed by either the Council or Highways England. Given this model plugs in to both air quality and noise, the Rule 6 party do not accept the council's stance not to challenge the appellant on air quality and noise issues. We understand that there may have since been an agreement with the VISSIM model, but the decision over air and noise predates this agreement and therefore would appear to have been premature in reaching such a decision.
- 1.6 Para 2.7 would appear to indicate that we are potentially heading into an inquiry, once again without sufficient information or agreement from the outset. We would politely request clarification of the current situation.

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