

Respondent: David Sawyer  
Respondent Ref. No: 2197

My name is David Sawyer and I am a retired civil engineer living at [REDACTED] ward of Warrington. I have actively opposed the development [REDACTED] 8 a member of the Peel Hall Rule 6 Party who appeared at the re-opened planning inquiry in 2020 and 2021.

I am making my submission today because I consider that the Updated Proposed Submission Version Local Plan dated September 2021 as prepared by Warrington Borough Council (WBC) fails to comply with the matters set out in Paragraph 2.1 of the Inspectors Guidance Notes dated 23/06/22. I refer in particular to WBC's failure to comply with its Statement of Community Involvement in the course of the preparation of the Local Plan (Revised).

The Statement of Community Involvement was produced in December 2021 and the document clearly sets out guidance for community participation and consultation on planning matters in Warrington. However following the conclusion of the Peel Hall Planning Inquiry in March 2021 WBC failed to engage with any of the local communities or residents groups located in the vicinity of Peel Hall during the pre-production and public participation stages of the local plan development.

In addition since the Statement of Community Involvement was produced I also consider that there has been a complete failure on the part of WBC to promote the use of Neighbourhood Plans and Neighbourhood Development Orders in accordance with the procedures set out in the Statement of Community Involvement.

The purpose of the Statement of Community Involvement is set out in Paragraphs 1.3 to 1.8 of the document and may be summarised as follows:

Paragraph 1.3 - this confirms that the document will guide all community involvement on planning matters in the Borough of Warrington, and it emphasises the importance of community consultation forming an integral part of planning changes in Warrington. Paragraph 1.3 also confirms that the Statement of Community Involvement has been prepared to ensure that the people of Warrington know when, how and for what reason they will be able to participate in planning matters.

Paragraph 1.4 - this states that 'In producing the Statement of Community Involvement, it is the Council's intention to promote effective public participation in the planning system. This will make sure that all sections of the community have the opportunity to be actively and continuously involved from the very start of the planning process both in the preparation and subsequent revision of the Local Planning Framework and in significant development management decisions.'

Paragraph 1.5 - this states that 'Involvement in the planning process should enable the local community to say what sort of place they want to live and work in the initial stages of plan production when it can make a difference. The council will aim to include "hard to reach groups" that have historically not engaged with the planning system including, young people, ethnic minorities, people with disabilities, Gypsies and Travellers and Travelling Show people.'

Paragraph 1.6 - this states that 'The aim is that by achieving greater community engagement throughout the planning process our stakeholders and other organisations will have an active involvement in identifying and addressing the main planning issues, and in the development of planning policies and proposals.'

Paragraph 1.7 - this highlights the benefits of involving a wider range of people and organisations throughout the planning process including:

- More focus on local needs and priorities
- Planning decisions informed by local knowledge
- Improved understanding of the process
- Wider ownership of the process
- Wider interest in monitoring outcomes

And finally Paragraph 1.8 - this states that 'When preparing planning documents or determining planning applications the Council must comply with the community engagement requirements as set out in the adopted Statement of Community Involvement. When a Local Plan is submitted to the Secretary of State for Examination in Public, a " Statement of Compliance" will be required to be submitted outlining how the community engagement requirements of the Statement of Community Involvement have been met during the Plan making process.'

Public participation in local plan contents and scope under Regulation 18 is set out in Paragraphs 2.9 to 2.13 of the Statement of Community Involvement and may be summarised as follows:

Paragraph 2.9 - This states that '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.'

Paragraph 2.11 - This states that 'At all stages the Council will respond positively to requests for further discussion, clarification, more information and advice wherever possible. If the draft report has any particular implications for specific areas or sites proposed for allocation, local interest groups will be approached with a view to raising awareness of the consultation process.'

Paragraph 2.13 - This states that the Council will take full account of the responses to this stage of consultation and all responses received will be used to produce the final Local Plan document. This initial stage of community consultation in the preparation of Local Plan documents enables people to express their views, put forward their own ideas and to actively participate in developing the Local Plan document.

The list of consultees set out in Appendix A of the Statement of Community Involvement includes:

- List 1 - Specific Consultation Bodies
- List 2 - Government Departments
- List 3 - General Consultation Bodies
- List 4 - other General Consultation Bodies - as and when deemed appropriate.

List 4 contains a reference to Tenant/ Resident Groups. As I mentioned at the commencement of my submission I have been a member of the Save Peel Hall Action Group in its many guises since 1998. In March 2020 several members of the group including myself applied for Rule 6 status prior to the commencement of the re-opened Peel Hall Planning Inquiry.

Over the following 12 months the Peel Hall Rule 6 Party:

- Sat alongside the WBC team during the two separate phases of the re-opened Planning Inquiry for almost 6 weeks.
- Exchanged countless emails and other forms of correspondence with the WBC team during the whole of the 12 month period.
- Submitted reports on Hydrology, Noise, Air Quality, Ecology, Transport and Loss of Amenity to the Inquiry totalling more than 60000 words.

However following months of engagement and document exchanges between the Rule 6 Party and the WBC team between March 2020 and March 2021 the Council made absolutely no attempt to meet with the Rule 6 Party later in 2021 as a consultee on Peel Hall in the period before the revised local plan was released for public scrutiny.

I consider this to be an extremely disappointing decision on the part of WBC not to engage with the Rule 6 Party particularly given the long and controversial nature of the Peel Hall site. The decision also goes against all the commitments made by WBC to public participation and community engagement in the planning process which are clearly set out in the Statement of Community Involvement.

This failure to engage meant that none of the local communities within the vicinity of Peel Hall was asked to be involved in the crucial pre-production and public participation stages of the local plan development.

Paragraph 2.44 of the Statement of Community Involvement clearly sets out the key groups of consultees with regard to the preparation of the local plan, including Resident and Community Groups. Therefore I should be grateful if WBC could now furnish this inquiry with a full list of those groups who were consulted in the weeks leading up to the publication of the Local Plan (Revised) in October 2021.

With regard to this lack of local participation then in recent weeks it has come to light that WBC has been working on a series of Low Traffic Neighbourhood (LTN) schemes for the town since 2018 without any of the neighbourhoods concerned being aware that this was taking place until very recently.

As a result of this new information the Peel Hall Rule 6 Group now firmly believes that the traffic modelling which was key to determining the outcome of the recent Peel Hall planning inquiry will be seriously compromised if the proposal for the LTN scheme in the Orford ward is implemented. This would result in the closure of a major road to through traffic and the displacement of up to 14000 vehicular traffic movements each day onto roads which formed the basis of the Peel Hall traffic modelling, including Winwick Road, Long Lane, Poplars Avenue and Sandy Lane West.

These roads were central to the Peel Hall traffic modelling outcome at the time of the inquiry and each will see a significant rise in unrecorded traffic should the Orford LTN scheme come to fruition in its original form.

What is even more disappointing is that much of the work on the Orford LTN scheme appears to have been carried out by WBC just at the time when the Peel Hall planning inquiry resumed in March 2021. As you may be aware the planning inspector Christina Downes had called a halt to the Peel Hall planning inquiry in September 2020 due to the incomplete nature of the appellant's traffic modelling. Ms Downes had proposed a resumption in March 2021 with a view to this matter being resolved.

However it now appears to be the case that at the very moment one highways team at WBC was signing off on the Peel Hall appellant's base traffic model a second highways team was planning to close a major through road in Orford, resulting in thousands of additional vehicular traffic movements taking place on the very roads that had formed the basis of the approved modelling.

Known as the Central 6 scheme due to the planning being directed towards six inner town wards in Warrington it has since transpired that none of the six neighbourhoods concerned has ever been involved with WBC in the preparation of neighbourhood plans and neighbourhood development orders to guide the future development of their areas.

The Statement of Community Involvement produced by WBC in 2020 contains a wealth of information relating to the preparation of neighbourhood plans and neighbourhood development orders. However WBC has singularly failed to promote this document or to make any attempt to get local communities on board with regard to the formation of local forums capable of being involved in the development of their own neighbourhoods. In truth none of the local community representatives I've spoken to in recent weeks is even aware that the Statement of Community Involvement actually exists.

Therefore it comes as no surprise to hear that to date over 8000 Warrington residents have signed two petitions calling for the immediate removal of the LTN schemes proposed for the Orford and Westy wards on the basis that they are not necessary or required by the respective local communities. The organisers of the petitions have also pointed to the fact that barely any consultation regarding the implementation of the LTN schemes had taken place within their communities in the weeks and months leading to their launch.

It is clear therefore that the preparation of the local plan has not complied with the Statement of Community Involvement. There was clearly no attempt to involve the Peel Hall Rule 6 Party as a consultee in the period before the local plan was released for public scrutiny, despite the fact that this group of residents contains a wealth of local knowledge in relation to the Peel Hall site.

This was a missed opportunity on the part of WBC because the traffic issues arising from the controversial decision to close a major road as part of the Orford LTN scheme may well have come to light much earlier had the council engaged with the Rule 6 Party and other community groups.

It is also the case that WBC should have actively promoted neighbourhood planning in the two years following the publication of the Statement of Community Involvement instead of keeping it as the town's best kept secret. Early engagement and active support in accordance with the Statement of Community Involvement with the residents of Orford and Westy may well have produced a different outcome with regard to the recent launch of the Central 6 LTN scheme.

Consultation is the key to the successful outcome of any planning proposal but WBC clearly doesn't see it that way, preferring instead to make important decisions in house with barely any local involvement or input. In recent years this imbalance and lack of accountability has seen WBC move progressively further away from its core beliefs and its responsibility to the neighbourhoods who elected it.