To whom it may concern,

These are additional comments to my previous representation for application 2019/34799; appeal APP/M0655/V/22/3311877

1. Flawed prediction of Economic Land Requirement in the Local Plan.

Warrington's Economic Development Needs Assessment (EDNA) 2021 concludes there is insufficient employment land. This is only because it has used the unprecedented release of land for employment at Omega to skew the figures. This has resulted in the figure of 316.26 Ha over the plan period, 17.57 Ha annually. If the job growth method had been used the shortfall over the plan period is only 21-43Ha land. Taking Omega out of the economic land use 1996 to 2020 gives an annual take up of around 8Ha, less than half the figure of the prediction by Warrington Borough Council.

Prior to this, an assessment of employment land was completed for the 2014 local plan. This showed the annual need was 11 Ha per year, an uplift of 20% was added to give the total requirement until 2027 (277 Ha). Again, the average figure was obviously affected by the take up of land at Omega, without which the average would have been around 9.5 Ha. Even using the overly generous figures quoted in the 2014 Local Plan Core Strategy there is more than 5 years supply of land beyond 2027. Now Fiddlers Ferry has been released there is sufficient economic land to meet the supply of Warrington.

It is totally unrealistic and not justified to use the unprecedented release of land at Omega to predict need - there is no justification for releasing 136.92 Ha from the Greenbelt for the South East Warrington Employment Area(Six56) (SEWEA).

Furthermore, there are already too many vacant office and warehouse space in Warrington, for example the site of the closed JTF store in Woolston.

2. Impact of COVID and Brexit

The economic climate has changed, there is no need for more warehouses when there is less demand for goods due to the cost of living crisis.

The land is good agricultural land and should be preserved for farming to ensure food supplies so we do not need to rely on imported food.

3. Green Belt

Given points 1 and 2 above, there are no exceptional circumstances to justify the release of land from the Green Belt. The harm to the Green Belt - loss of openness and the adverse effect on the character of the area - does not outweigh any supposed economic benefit.

4. Road Network

The M6 between Junctions 19 and 21 is the site of far too many incidents involving lorries already. This is also the case for the dumbbell roundabouts at Lymm, where traffic to Six56 would leave the motorway network. I would like to see actual plans for the improvements on the dumbbell roundabouts. At the first meetings to launch Six56 a third lane on the roundabout was mentioned. The junction on the B5158 Cherry Lane onto the roundabout has apparently been at capacity since 2017 - Moto planning documents.

5. Air Quality

Warrington already has poor air quality and high incidence of respiratory illness - Cities Outlook 2020 ranked Warrington third in the North West for deaths due to air pollution. We live next to the motorway AQMA - we need actual measurements of pollution - not a computer generated model. We have repeatedly requested nitrogen dioxide tubes from the Parish Council to no avail after the Truckwash, with over 400 HGV movements daily, was granted permission next to our homes.

6.Noise - When the group of houses were built where I live, the M6 motorway either had not been built or was in its infancy. With the impact of cumulative planning decisions, for example the Thelwall Viaduct expansion and the creation of the dumbbell roundabouts on the motorway interchange, the noise for residents has progressively increased. In a recent memo concerning the Moto services planning application to extend onto a field within the Green Belt it was noted that one of the properties abutting the exit from the motorway fell within the DEFRA 1% Noise Important Planning Areas. As we live around 100m from the dumbbell roundabouts we are also impacted by high levels of noise. However, planning applications use the high background noise we already experience to make the case that 'it's already noisy so a bit more doesn't matter'! Acoustic studies use average noise - humans do not hear average noise - we experience the peaks of sirens, horns, engines revving as well as aircraft noise. What mitigation are residents being offered for the impact of noise? National Highways have an insulation scheme - will this be offered to affected residents?

There is something very wrong with with planning process in Warrington which is leading to its residents suffering from high levels of noise (higher than that in Manchester) and air pollution is it a case of it's already high so a bit more doesn't matter?

The fact that the South Warrington Parishes Planning Group needed to be formed in the first place - as stated on the Lymm Parish Council home page 'to try and stop the proposals for overdevelopment in South Warrington' is very concerning. It would appear that there is something amiss in the balance of representation in the Council Development Management Committee that is leading to development being passed for South Warrington which is detrimental to the character and landscape of the area.

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Evidence:

Warrington Local Plan Core Strategy Adopted 2014 - Economic Land requirement to 2027 and beyond.

Growing the Economy

- 6.11 Sources of employment land supply within the borough include:
- Sites under construction;
- Sites with extant approvals for development; and
- The Omega Site (including phases 3, 4 & 5) and Lingley Mere.
- **6.12** The table below shows the current employment land position from 2006 to 1st April 2012. Sites under construction and those with planning permission indicate that there is a need for approximately 71 hectares of employment land within the plan period to meet the identified requirement. This can be entirely met by the Omega Strategic Location which accounts for over 130 hectares in total.

Plan Period 2006-2027	21 Years Requirement
21 x 11 Ha. + 20% choice factor	277 Ha
Completions (2006-2012)	59.27 Ha
Under Construction at 1/4/12	3.98 Ha
Identified Sites at 1/4/12 (Sites with Planning Permission including Omega Phases 1 & 2)	142.01 Ha (13 years forward supply)
Total Available	205.26 Ha
TOTAL REQUIREMENT	277 Ha
Remaining Requirement to 2027	71.74 Ha
Omega Strategic Site	130.19 Ha
Total Available	335.45 Ha
Residual Post 2027	+58.45 Ha (5.3 years)

Table 2 Employment Land position at 1st April 2012

Warrington Borough Council Adopted Local Plan Core Strategy

DEFRA Noise Action Planning Important Area - At Cherry Corner we live in one of the top 1% noisiest areas due to cumulative impact.

