

WARRINGTON BOROUGH COUNCIL LOCAL PLAN

REGULATION 19

RESPONDING TO REPRESENTATIONS REPORT

1 Introduction

- 1.1 This Report provide an overview of the consultation that was undertaken on the Proposed Submission Version Local Plan (PSVLP) in 2019.
- 1.2 A schedule of main issues raised in the representations received during the consultation and the Council's response to those issues is provided in Appendix 1 to this report.

2 Consultation Process

- 2.1 The consultation on the PSVLP under regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 was held between April and June 2019. The consultation process was in accordance with the regulations and the Council's Statement of Community Involvement (SCI).
- 2.2 All residents of the Borough received a letter notifying them of the consultation. Emails and letters were also sent to those on the Council's Local Plan mailing list. This included people who made representations at earlier stages of the Local Plan process and other individuals, groups and organisations who has asked to be updated on the Local Plan, including a number of organisations representing 'hard to reach' groups. A notice was placed in the Warrington Guardian on April 11th 2019 to publicise the consultation together with publicity on the Council's web site and on social media.
- 2.3 Six public consultation events were held between 8th May and the 8th June. Five of these events were held on weekdays from 2pm to 8pm at the Halliwell Jones stadium. A further event was held on a Saturday between 10am and 5pm at Parr Hall. Large venues were chosen to meet the demand after more localised venues at the previous round of Local Plan consultation struggled to accommodate the numbers attending.
- 2.4 Both The Halliwell Jones Stadium and Parr Hall are centrally located, with large car parks, are near train and bus interchanges and fully accessible to all. The consultation was done jointly with the Local Travel Plan 4 consultation which brought out the links between the 2 documents. There were numerous display boards with Officers in attendance to answer questions and support the event, response forms were also available.
- 2.5 There were also a number of special events for 'hard to reach' groups this included. This included presentations to Warrington's Disability Forum in April 2019; the IMPACT Warrington's Youth Council in June 2019; and the Voluntary Action Network in April 2019.

3 Overview of Respondents and Representations

- 3.1 In total there were 3,185 respondents to the consultation who made a total of 11,712 individual representations.
- 3.2 Over 90% of respondents were local residents together with local elected representatives and local groups and organisations. The overwhelming majority of these responses were concerned with the scale and location of development being proposed, in particular relating to the release of Green Belt land, and the impact of development on Warrington's infrastructure.
- 3.3 The remainder of respondents included statutory consultees (including national bodies and neighbouring Councils); and developers and land owners actively promoting sites through the Local Plan process. Responses were also received from local businesses and visitors to the town.
- 3.4 The Council also received 2 petitions.
- a petition with 968 signatories against the development of the Peel Hall site; and
 - a petition with 189 signatories from Burtonwood residents which requested an extension to the consultation time limit due to them being unaware of the Draft Local Plan consultation.
- 3.5 A total of 142 late responses were received which were considered by the Council but were recorded as 'late'.

4 Main Issues from Consultation

- 4.1 A summary of the main issues from the consultation and the Council's response to these issues are contained in the schedules provided at Appendix 1 (*to follow*). The main issues are separated by the different sections and policies of the Plan, as well as by the supporting evidence base.
- 4.2 The representations themselves were published on the Council's web site in 2020. [Local Plan Review documents 1-250 | warrington.gov.uk](https://www.warrington.gov.uk/local-plan-review-documents-1-250)
- 4.3 The headline issues raised by different categories of respondents are set out below.
- 4.4 *Responses from public / parishes / elected representatives:*
- Concern that the Plan is resulting in the release of an excessive amount of Green Belt land due to housing and employment land requirements being overstated and with brownfield capacity being underestimated, particularly given the closure of Fiddlers Ferry Power Station
 - Imbalance of Green Belt release between north and south Warrington.
 - Widespread concern about the increase in traffic and impact on air quality.

- Concern that location of new homes does not reflect where the majority of existing and future employment opportunities are located, which will result in more commuting and congestion.
- Employment allocations are just to provide logistics facilities and will only provide low value jobs.
- Concern about impact on social infrastructure, in particular schools, GPs and Warrington Hospital.
- Concern over the environmental and ecological impacts of loss of countryside.
- Scepticism over whether new infrastructure required to support development will be delivered and if the funding gap in the Infrastructure Delivery Plan can be plugged.
- Concern that new development will not be affordable for local residents and will provide housing for people commuting into Manchester and Liverpool.
- Objections to the proposed Garden Suburb allocation with wide ranging concerns raised over loss of Green Belt; impacts on the natural and built environment; impacts on existing transport and social infrastructure; and concern that additional infrastructure required to support development will not be delivered.
- Objections to the South West Urban Extension and Waterfront (including Port Warrington) with wide ranging concerns raised over loss of Green Belt, the risk of Warrington merging with Halton; impacts on the natural environment, in particular concerns over the loss of Moore Nature Reserve; detrimental impact on the character of the existing area; and the increase of traffic and congestion.
- Objections to the Peel Hall allocation with concerns raised over loss of an extensive area of green open space and the traffic and associated air quality impacts of development.
- Range of objections to the sites within the outlying settlements relating to loss of Green Belt, highways impacts and impacts on local services, with by far the largest number of responses objecting to the proposed Burtonwood allocation.

4.5 *Responses from landowners and developers:*

- Concern that the Plan's housing and employment land requirements are too low.
- Economic projections are too conservative, particularly given Warrington's historically high levels of growth.
- Need for increased flexibility within land supply given risks associated with proposed large urban extensions.
- Brownfield capacity overestimated, particularly in the town centre.
- Need for safeguarding land beyond Plan period to ensure that revised Green Belt boundaries are capable of enduring over the long term.
- Comments on spatial strategy largely dependent on whether a respondent's land has been included within a proposed allocation, but a consistent theme is that additional allocations are required in the outlying settlements and on smaller sites around the main urban area to provide balance with the large urban extensions.
- Concern that the viability evidence underpinning the Plan is not sufficiently robust.
- Belief that increased flexibility is required within the Plan, in particular relating to provision of affordable housing, accessibility standards, self-build and custom housing and contributions towards infrastructure.

4.6 *Responses from neighbouring authorities and statutory consultees:*

- No significant issues raised by neighbouring authorities, although Cheshire West & Chester / Cheshire East requested further work be undertaken to understand the potential highways impacts of the Garden Suburb. Cheshire East also sought assurance in relation to the supply of minerals, given the amount of development proposed across the wider sub region.
- Highways England raised concerns with the Local Plan Transport Model Report and the level of information provided.
- Natural England requested greater detail relating to mitigation measures as part of the Habitats Regulation Assessment (HRA).
- Historic England requested additional detail in allocation policies to ensure appropriate mitigation of heritage assets and the strengthening of a number of policies where there is a heritage consideration, in line with the findings of WBC's Heritage Impact Assessments.
- United Utilities and National Grid requested a number of amendments to the Plan to ensure that the impacts of new development can be appropriately mitigated and that their infrastructure is protected.

4.7 The level of objection from local residents is reflected in the proportion of respondents who considered that the Plan was not legally prepared, did not meet the tests of soundness or did not fulfil the Duty to Cooperate, as summarised in the table below.

Table.1 – Numbers and Percentage of Representations on Legality, Soundness and Duty to Co-operate

Percentage of Responses based on 3185 representations	Yes	No	Did not answer
Is the Local Plan (PSVP) legal	117 (3.6%)	1250 (39.2%)	1818 (57.1%)
Is the Local Plan (PSVP) sound	17 (0.5%)	1270 (39.9%)	1,898 (59.6%)
Does the Local Plan (PSVP) fulfil the duty to co-operate	103 (3.2%)	1274 (40%)	1,808 (56.8%)

4.8 The policies that received most representations (over 500) were:

- DEV1 Housing Delivery
- DEV4 Economic Growth and Development
- MD2 Warrington Garden Suburb
- MD3 South West Urban Extension
- OS1 Burtonwood

4.9 As above, the vast majority of these representations were from residents concerned with the level of growth being proposed in the Plan and objecting to specific site allocations.

5 Consultation on Updated Proposed Submission Version Local Plan

- 5.1 Having considered in detail the key issues raised from the 2019 consultation including representations on policies and allocations, and after having undertaken additional evidence base and options assessment work, the Council is proposing a number of significant changes from the previous Proposed Submission Version Local Plan (2019).
- 5.2 These changes include:
- a reduction of the Plan's housing requirement;
 - the allocation of the Fiddlers Ferry site for employment and housing, following closure of the power station in March 2020;
 - the removal of some of the previous Green Belt allocation sites, including Port Warrington and the Business Hub, the South West Urban Extension, the Phipps Lane site in Burtonwood and the Massey Brook Lane site in Lymm; and
 - the reduction in size of the South East Warrington Urban Extension (previously known as the Garden Suburb).
- 5.3 Given the scale of changes being proposed, the Council has produced an updated Proposed Submission Version Local Plan (2021) and this will be required to be subject to a further round of consultation prior to submission for independent examination.
- 5.4 Subject to approval by Cabinet and Full Council the Proposed Submission Version Local Plan (2021) will be published for statutory consultation to commence in October 2021 and extend for 6 weeks.
- 5.5 The Council will be undertaking a similarly comprehensive programme of consultation to that undertaken on the previous version of the Plan. The Council will be notifying all respondents to previous Local Plan consultations as well as advertising the consultation in the local press, on the Council's web site and through social media. The Council will ensure additional notification is provided to engage hard to reach groups, including younger people and BME communities.
- 5.6 The Council will be holding a number of public consultation events at a single central location, giving people the opportunity to discuss the Updated Proposed Submission Version Local Plan in detail with Officers. The Council will also be holding on-line broadcast events as well as publishing an on-line video explaining the key proposals within the Updated Proposed Submission Version Local Plan and how people can make representations.

APPENDIX 1 – RESPONSES TO KEY ISSUES FROM REPRESENTATIONS

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Introduction	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The views of local residents should have some influence on how their town is planned and developed and not just have ideas imposed upon them. Massive objection to these plans which appear to have had no effect on this draft Local Plan. 	<ul style="list-style-type: none"> All the representations received at the Regulation 18 Preferred Development Option (PDO) stage, along with the comments received during the previous 2019 Regulation 19 Proposed Submission Version Local Plan (PSVLP) consultation have been taken into account by the Council and have informed the updated Regulation 19 Draft Local Plan (2021).
<ul style="list-style-type: none"> I previously commented on the Preferred Development Options in September 2017. I note in the introduction (1.2.5) that you had 4500 responses to the PDO, and that all have been taken into account in the preparation of the PSVLP. As a result I have reviewed the plan specifically to see how my concerns have been addressed. My primary concerns with the PDO were over the unnecessary release of Green Belt land, particularly in the South East area. I feel that none of these criticisms have been given due weight. 	<ul style="list-style-type: none"> All the representations received at the Regulation 18 Preferred Development Option (PDO) stage, along with the comments received during the previous 2019 Regulation 19 Proposed Submission Version Local Plan (PSVLP) consultation have been taken into account by the Council and have informed the updated Regulation 19 Draft Local Plan (2021). Since the PDO stage and previous 2019 PSVLP consultation, the amount of land being proposed to be released from the Green Belt has reduced by 7% and now represents 5% of the Green Belt land in the Borough, which equates to the loss of 580 ha of Green Belt land, as opposed to the previous figure of 1210 ha.
<ul style="list-style-type: none"> Introduction and Overview: In my view the PSV should demonstrate that it has adopted a big picture approach considering all options and that in doing so it has achieved an appropriate balance between sustainability and growth. 	<ul style="list-style-type: none"> The PSVLP (2021) contributes to the achievement of sustainable development, taking in to account the Social, Economic and Environmental objectives of Sustainable Development. Both the 2019 and updated PSVLP 2021 have also been tested through the iterative Sustainability Appraisal and Strategic Environmental Assessment process.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Statutory Consultees	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Other	

Consultation Process	
Summary of Issues Raised	Response
Residents:	
<ul style="list-style-type: none"> • The Local Plan consultation was not carried out in line with the Council's own SCI or the 2012 Planning Regulations and failed to involve the community. 	<ul style="list-style-type: none"> • The Council considers that the consultation was carried out in line with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of the Council's Statement of Community Involvement. Through the availability of Planning Officers on a daily 9.00am to 5.00pm basis to discuss any issues, and the various public consultation events held, there were ample opportunities for public engagement and community involvement in the Local Plan process.
<ul style="list-style-type: none"> • Raise questions over the Local Plan consultation questionnaire. It is suggested that it was constructed to discourage residents from responding. It was a highly technical and not a user friendly document. 	<ul style="list-style-type: none"> • The Council undertook the Regulation 19 consultation in line with the Council's Statement of Community Involvement (SCI). The SCI commits the Council to providing a standard response form to aid representation submissions. The questionnaire layout was based on PINS best practice guidance. However, other forms of representation submissions were accepted by the Council, for example by e-mail or letter.
<ul style="list-style-type: none"> • There were over 4,500 consultation responses submitted to the PDO, which appear to have been largely ignored in the Draft Local Plan, nothing has changed. 	<ul style="list-style-type: none"> • All the representations received at the Regulation 18 PDO stage were considered by the Council, taken into account and have informed the previous Proposed Submission Version Local Plan (2019) and the updated 2021 PSVLP. <p>For example, questions were raised about the impact of the EU Referendum, and the Council's housing figure being too high. This resulted in a comprehensive review of the housing and employment evidence bases in both 2019 and 2021, using updated forecast and projection data.</p> <p>The economic forecast data used to inform the previous PSVLP (2019) post-dates the EU Referendum decision. The downward revision of forecast jobs growth therefore resulted in a consequential reduction in the previous 2019 PSVLP housing target from 1,113 homes per annum to 945 homes per annum. Using the Governments Standard Housing</p>

Consultation Process	
Summary of Issues Raised	Response
	Methodology and not applying a jobs uplift to support economic growth ambitions, has reduced this number even further in the updated PSVLP (2021) to 816 homes per annum.
<ul style="list-style-type: none"> • Many residents did not receive letters and those that did were not addressed by name. 	<ul style="list-style-type: none"> • The Council wrote to every residential and commercial address in the Borough to inform them of the 2019 PSVLP consultation, with letters being hand delivered to each residential address. It is, however, correct that letters were not addressed by name.
<ul style="list-style-type: none"> • The venue for the consultation events was not accessible or held in the areas most affected by the proposed development. 	<ul style="list-style-type: none"> • Given the large volume of residents attending the PDO consultation events at various locations across the Borough in 2017, many of whom had to form a que and wait in line to gain entry, it was decided to have 1 large central venue for the PSVLP 2019 consultation. The Halliwell Jones Stadium was chosen as the consultation venue as it is a large venue, in a central location within the Town, being close to the Bus Interchange, Train Stations and various car parks.
<ul style="list-style-type: none"> • Communication has been mainly online and not everyone has access to the internet. 	<ul style="list-style-type: none"> • As well as using electronic communications, the Council wrote to every residential and commercial address in the Borough to inform them of the Draft Local Plan consultation, with letters being hand delivered to each address. An advert was also placed in the Warrington Guardian, informing readers of the start of the Local Plan consultation, and how and where they could get involved.
<ul style="list-style-type: none"> • WBC Local Plan consultation website is not user friendly. 	<ul style="list-style-type: none"> • Comments duly noted and it is accepted that the website contains a large amount of material relating to the Local Plan. However, Officers were available on a daily basis during and after the consultation to receive telephone calls and respond to emails, should a request be made to ensure participants could be directed to the relevant information they were looking for.
<ul style="list-style-type: none"> • Top down approach to consultation. 	<ul style="list-style-type: none"> • The consultation was carried out in line with Planning Regulations and the Council's Statement of Community Involvement.
<ul style="list-style-type: none"> • Consultation material was inadequate, no road names on maps for example. 	<ul style="list-style-type: none"> • This comment is noted and it is acknowledged that it was difficult to provide a base map with readable road names on at the scale used for

Consultation Process	
Summary of Issues Raised	Response
	consultation. However, the Maps were annotated with some key landmarks and roads/junctions to assist people to orientate themselves with the proposals. Officers were also available to assist participants in locating features on the maps and the diagrams used for consultation.
<ul style="list-style-type: none"> • The statistics, facts and figures used by the Council in support of its Local Plan, should be made public for transparency. 	<ul style="list-style-type: none"> • All of the evidence base documents produced by the Council in support of the PDO and PSVLP have been made publically available on the Council's website and key documents were also available to view both electronically and in paper format at the consultation events.
<ul style="list-style-type: none"> • There is little evidence that the Council has liaised with or consulted neighbouring Local Authorities. 	<ul style="list-style-type: none"> • Throughout the whole of the Plan making process, the Council has engaged constructively with all neighbouring Local Planning Authorities and Statutory Consultees through the Duty to Cooperate process. This process is well document throughout the Council's Duty to Cooperate Statement and Statement of Common Ground, both of which were made publicly available as part of the PSVLP 2019 consultation process.
<ul style="list-style-type: none"> • As part of WBC's Statement of Representations Procedure and Availability of Documents and in accordance with Regulation 19 of the 2012 Local Planning Regulations, a number of documents should have been available for public inspection over the consultation period. These include the Proposed Submission Version Local Plan and evidence base reports and other supporting documents. While these were available as on-line resources, the complete range of supporting documents was not available in the local library. There was almost total reliance on on-line sources. 	<ul style="list-style-type: none"> • A paper copy of the following documents were made available for public inspection at the locations specified in the Council's SCI and in line with the 2012 Regulations. <ul style="list-style-type: none"> • The Proposed Submission Version Local Plan (including Proposals Map); • Supporting Sustainability Appraisal; • Habitats Regulations Assessment; • Statement of Representations Procedure; • Copy of the online response form and guidance note; and • Privacy Notice. • Printed Paper copies all the documents listed above and supporting evidence bases were also available to view up on request at the Council's main Town Centre Office throughout and beyond the consultation period.
MP, Local Borough, Town or Parish Councillor:	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •

Consultation Process	
Summary of Issues Raised	Response
<i>Landowner/Developer (0):</i>	
• None	•
<i>Statutory Consultees (0):</i>	
• None	•
<i>Other (13):</i>	
• None	•

Warrington in Context	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • There is an overprovision of housing which continues to get built in villages. The motorway and road system is unreliable and does not support development therefore the proposal to expand Warrington should be reconsidered and natural growth and regeneration to the town centre should be put forward due to climate instability, food security, air quality, financial insecurity and the inadequate infrastructure. 	<ul style="list-style-type: none"> • Comments duly noted; however, the points raised have been covered in other response areas, including 'Spatial Strategy' and 'Plan as a Whole'.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • The emerging policies are generally supportive toward the provision of new and expansion of existing tourism facilities in the town. In particular, it is positive that alongside other local attractions, Gulliver's World rightfully receives recognition as a regional attraction with net economic and employment benefits. In particular, support is given in the preamble to the policies at paras 2.1.30; 2.2.3 to 2.2.4 and 8.1.15. 	<ul style="list-style-type: none"> • Comments duly noted.
Statutory Consultee	
<ul style="list-style-type: none"> • Figure 2 – Warrington in the Region, we feel that a key would be useful to more clearly identify the various features that are shown on the map, including the Atlantic Gateway and to distinguish between the roads and rail routes, as well as some additional labels to identify the major roads such as the M6 and M56. 	<ul style="list-style-type: none"> • Comments noted. However, the map at figure 2 is the same map as is presented in the adopted Core Strategy (2014). No further action required.
Other	
<ul style="list-style-type: none"> • Include an additional bullet point to read: 'the sustainable supply of Minerals and Mineral products to meet development aspirations' 	<ul style="list-style-type: none"> • Agree. The updated 2021 PSVLP has been amended to reflect comment.
<ul style="list-style-type: none"> • Inclusion of the Trans Pennine Trail is welcomed to highlight Warrington's commitment to sustainable transport routes. 	<ul style="list-style-type: none"> • Comments duly noted.

Spatial Portrait	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The Spatial Portrait does not recognise the particular issues associated in the middle tier of government in the form of directly elected mayors with enhanced powers for the major city regions of Manchester and Liverpool. 	<ul style="list-style-type: none"> • Comments noted, however, this is not the purpose of a Local Plan Spatial Portrait.
<ul style="list-style-type: none"> • There is a brief mention of HS2 – and a suggestion that this will “improve its links nationally”. HS2 is likely to be a net negative to Warrington with the agreed Phase 2b decision. 	<ul style="list-style-type: none"> • Comments noted, however, this is not the purpose of a Local Plan Spatial Portrait.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • The narrative should also have mentioned that the New Town Development Corporation was also planning to construct an express way from Stretton (M56) in the south of the Town, across the Bridgewater canal, the Manchester Ship canal, via a new high level bridge, the river Mersey and railway lines, and then splitting to link to the M62 and M6. This would be built before large scale building projects would begin and was regarded as necessary to cope with the additional traffic the population and industrial growth would generate 	<ul style="list-style-type: none"> • Comments noted, however, this is too detailed and not the purpose of a Local Plan Spatial Portrait.
Landowner/Developer	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England: The title of Para 2.1.42 should be amended to read: “Warrington’s Historic and Natural Environment” An additional paragraph should be included which summarises the character of Warrington as a place. 	<ul style="list-style-type: none"> • Agree. Proposed amendment as requested has been made to the updated PSVLP (2021).
<ul style="list-style-type: none"> • An additional bullet should be introduced to read: An improved historic and built environment, that sustains local character and distinctiveness, conserves and enhances its important assets and recognises the opportunities it can bring to town. 	<ul style="list-style-type: none"> • Agree. Proposed amendment as requested has been made to the updated PSVLP (2021).
Other	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •

Vision	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The Plan does not provide an appropriate balance between sustainability and growth. The economic studies underpinning the plan are based on desire rather than need and therefore the major beneficiaries are likely to be the developers with little benefit to existing residents. 	<ul style="list-style-type: none"> The Vision provides a comprehensive basis to ensure future development in Warrington is sustainable, giving specific consideration to economic, environmental and social issues. The Plan as a whole and its individual components, including the Vision, have been subject to independent Sustainability Appraisal, to ensure that the Plan provides an appropriate balance between economic, environmental and social factors. The Council has strengthened the vision in the updated PSVLP to give greater emphasis to climate change and biodiversity. This follows the Council declaring a Climate Emergency in 2019 and an Ecological Emergency in 2020.
<ul style="list-style-type: none"> There is a concern that the Vision is intended to transform Warrington from a town into a city. 	<ul style="list-style-type: none"> Reference to 'Warrington New City' has been removed from the Plan following the Preferred Development Option consultation. The Plan's Vision is focused on meeting Warrington's identified development needs.
<ul style="list-style-type: none"> There has been a lack of community involvement in defining the vision and objectives. 	<ul style="list-style-type: none"> The starting point for the Vision was that contained in the adopted Local Plan, which was itself subject to extensive consultation. The Vision has been reviewed, updated and refined taking into account the responses to the two stages of Regulation 18 consultation and the consultation on the previous Proposed Submission Version Local Plan.
<ul style="list-style-type: none"> The development proposed in the Plan contradicts the Vision. Development will result in the loss of large amounts of Green Belt and countryside and the loss of the distinct identify and character of a number of existing settlements, particularly in south Warrington. 	<ul style="list-style-type: none"> All development options considered in preparing the Plan have been assessed against the Plan's Objectives which are derived from the Vision. The Council is therefore confident the development proposals in the Plan are consistent with the Vision. Where there are potential conflicts, then appropriate mitigation is included within relevant Plan policies. It should also be noted that the level of development proposed in the Updated Proposed Submission Version Local Plan (2021) has been reduced, with a corresponding reduction in the amount of Green Belt land proposed for release.

Vision	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The vision is to be welcomed but the Plan falls short of achieving it. Aspirations such as ‘improving leisure and active travel opportunities’ and ‘increasing the borough’s biodiversity’ seem empty words. 	<ul style="list-style-type: none"> • The Plan includes a Monitoring Framework, comprising a range of indicators, which will be assessed on an annual basis to ensure the progress is being made in achieving the Plan’s Objectives and in delivering the Vision. If monitoring identifies that there is a risk to the Plan’s delivery then this enables the Council to identify necessary interventions, including a potential review of the Plan.
<ul style="list-style-type: none"> • Proposals in the Plan for large areas of warehouse development do not support the Vision to create strong economy that benefits everyone, with the majority of new jobs likely to be low skilled. 	<ul style="list-style-type: none"> • The Plan allocates land for employment development which the Council believes best meets Warrington’s identified needs. When considered with Warrington’s existing employment locations and the potential for new employment in the town centre, the Council believes the development proposals in the Plan are fully consistent with the Vision.
<ul style="list-style-type: none"> • There is a concern that the infrastructure required to support new development will not be delivered. 	<ul style="list-style-type: none"> • The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the Plan. The Council is confident that the infrastructure required to support the Plan is capable of being delivered. The Plan contains a review mechanism In the event that there is any future issue with infrastructure delivery.
<ul style="list-style-type: none"> • New housing development proposed in the Garden Suburb will not be well connected to the rest of Warrington. It will therefore provide a commuter dormitory suburb for Liverpool and Manchester and will not contribute to Warrington’s economic growth. 	<ul style="list-style-type: none"> • The Council considers that the location of development proposals, together with proposed new and improved infrastructure, will ensure that future development is effectively connected to the rest of Warrington and in particular the town centre. The Local Plan closely reflects the Council’s new Local Transport Plan (LTP4) which seeks to improve connectivity throughout the borough by sustainable modes.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • The development proposed in the Plan contradicts the Vision. Development will result in the loss of large amounts of Green Belt and countryside and the loss of the distinct identify and character of a number of existing settlements, particularly in south Warrington. 	<ul style="list-style-type: none"> • All development options considered in preparing the Plan have been assessed against the Plan’s Objectives which are derived from the Vision. The Council is therefore confident the development proposals in the Plan are consistent with the Vision. Where there are potential conflicts, then appropriate mitigation is included within relevant Plan policies. It should also be noted that the level of development proposed in the Updated

Vision	
Summary of Issues Raised	Response
	Proposed Submission Version Local Plan (2021) has been reduced, with a corresponding reduction in the amount of Green Belt land proposed for release.
<ul style="list-style-type: none"> The Vision is speculative in terms of the benefits of high speed rail with no direct link to Warrington being provided by HS2 and no certainty over Northern Power House Rail. 	<ul style="list-style-type: none"> HS2 services will begin to call at Warrington between 2029 and 2033. These will operate on dedicated infrastructure between London and Crewe before using the existing West Coast Main Line. Northern Powerhouse Rail represents a significant aspiration to enhance intra-regional connectivity across the North of England. The Council considers that the Northern Powerhouse Rail infrastructure should serve Central Warrington. This would provide a unique opportunity as the only location where the West Coast Main Line and potentially HS2 to Scotland can meet Northern Powerhouse Rail at a key economic centre. As such, it is important that this forms part of the Local Plan Vision as well as being integral the Council's Local Transport Plan.
Landowners/Developers	
<ul style="list-style-type: none"> General support for the Vision and balance between positively planning for growth and sustainability. 	<ul style="list-style-type: none"> Support noted
<ul style="list-style-type: none"> Some concern that the removal of the reference to 'Warrington New City' means that the growth aspirations of the Plan have been reduced following the Preferred Development Option Consultation. 	<ul style="list-style-type: none"> Reference to 'Warrington New City' has been removed from the Plan following the Preferred Development Option consultation. The Plan's Vision is focused on meeting Warrington's identified development needs.
<ul style="list-style-type: none"> The vision is too lengthy and its focus and intent is lost. The Vision should be short and concise, setting out the Council's Vision for the Local Plan going forward, and the need to boost housing and employment and the Borough's role in delivering these needs in the Plan period. If the Council is minded to retain the Vision as drafted, it is suggested that "to achieve this Vision" is inserted prior to Points (2) to (11) which identifies how this will be delivered. 	<ul style="list-style-type: none"> The Council considers that the Plan's Vision is clear in its intent for how Warrington is to develop over the Plan Period and beyond. It provides a common thread running through the Plan's objectives, spatial strategy and individual policies. The Council therefore disagrees with this suggested modification.
<ul style="list-style-type: none"> The Plan does not consider in full the role of the outlying settlements due to the focus on the Warrington urban area. This over-reliance on the urban area will result in deliverability issues over the Plan period. 	<ul style="list-style-type: none"> The Council has given detailed consideration to the potential of the outlying settlements through the options assessment process. The

Vision	
Summary of Issues Raised	Response
	Council considers the level of development allocated to the settlements to be appropriate in the context of the Plan's overall spatial strategy.
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • Historic England support the vision 	<ul style="list-style-type: none"> • Support noted.
<i>Other</i>	
<ul style="list-style-type: none"> • Transpennine Trail request that specific reference is made to the Transpennine Trail to enhance the lack of regional connectivity 	<ul style="list-style-type: none"> • Specific reference is given to the Transpennine Trail and its importance in improving connectivity between Warrington and wider region in the Plan's spatial portrait and in Policy DC3 Green Infrastructure. The Council does not therefore consider a specific reference to the Transpennine Trail is required in the Plan's Vision.

All Objectives	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Green Belt was only confirmed 5 years ago in the adopted plan it is supposed to last 20 years 	<ul style="list-style-type: none"> • Following the High Court ruling in 2015 which quashed the housing target in the Council's adopted Local Plan Core Strategy (2014), the Council sought to update its housing policies. However, it became clear that the Borough's development needs going forward could no longer be met within the existing urban area, without exploring the need to release Green Belt land to meet identified development needs. This resulted in a full Local Plan review, and the need to review the Borough's Green Belt boundaries as part of this process.
<ul style="list-style-type: none"> • Objection to the Green Belt release as there is sufficient brownfield land to meet development needs 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council has also undertaken additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this is now incorporated into the SHLAA. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The updated PSVLP (2021) now allocates the Fiddlers Ferry Site for development, the majority of which will come forward in the Plan Period. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews
<ul style="list-style-type: none"> • Lack of community involvement in options assessments 	<ul style="list-style-type: none"> • The starting point for the Vision and Objectives was the existing contained in the adopted Local Plan, which was itself subject to extensive consultation. The Vision and Objectives have been reviewed, updated and refined taking into account the responses to the two stages of Regulation 18 consultation and the Regulation 19 consultation undertaken on the previous PSVLP in 2019.
<ul style="list-style-type: none"> • Too much emphasis on growth 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2021) using data which post-

All Objectives	
Summary of Issues Raised	Response
	dates the EU Brexit referendum. The Council no longer considers the previous scale of jobs growth to be realistic. However, the Council is confident the amount of land being proposed for employment uses in the updated PSVLP (2021), based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations.
<ul style="list-style-type: none"> • Objection to the promotion of Warrington as a city 	<ul style="list-style-type: none"> • Reference to 'Warrington New City' has been removed from the Plan following the Preferred Development Option consultation. The Plan's Vision is focused on meeting Warrington's identified development needs.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • Generally supportive of the Objectives. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Local Plan fails to consider in full the role of the outlying settlements due to the Plan's continued focus on the Warrington Urban Area. 	<ul style="list-style-type: none"> • In the NPFF chapter 11 Making effective use of land at point 119 it is stated that 'Planning policies and decision should promote effective use of land in meeting need for homes and other uses ...' and the 'Strategic policies should set out a clear strategy for accommodating objectively assesses needs, in a way that makes as much use as possible of previously-developed or brownfield land'. As the majority of this type of land is within the existing urban area the Council has focused on the urban areas of Warrington. • The outlying settlement are in Green Belt and though there is Green Belt release proposed by the Plan there is also an awareness that only in exceptional circumstances should Green Belt Land be released. • A comprehensive Green Belt assessment has been undertaken and this has informed the Plan's spatial strategy and individual allocations. Following consultation on the previous PSVLP, the Council has considered representations and reviewed the evidence base underpinning the assessment process. Having undertaken this process the list of sites allocated in the outlying settlements included for allocation in the revised Proposed Submission Version Local Plan (2021) have been updated. In

All Objectives	
Summary of Issues Raised	Response
	addition to contributing to Warrington's overall development needs, each site will increase housing choice, provide affordable housing and support the vitality and viability of local services in the respective settlements.
Statutory Consultees	
•	•
Other	
• Generally supportive of the objectives	• Support noted

Spatial Strategy	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Insufficient consideration has been given to the impact on Climate Change, the Government’s 25 year Environment Plan and the Government’s commitment for net zero emissions by 2050. 	<ul style="list-style-type: none"> • The Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on Climate Change through the Sustainability Appraisal process. The Council has strengthened reference to Climate change in the vision and objectives of the Updated Proposed Submission Version Local Plan to reflect the Council having declared a Climate Emergency. A number of the Local Plan policies include specific provision to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change. The Council has also published an addendum to the Sustainability Appraisal Report which gives specific consideration to the 2020 Heathrow Airport 3rd Runway High Court judgement.
<ul style="list-style-type: none"> • Insufficient consideration has been given to impact on health, in particular the impact on air quality but also on the importance of green space for physical and mental wellbeing. 	<ul style="list-style-type: none"> • The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process.
<ul style="list-style-type: none"> • Brownfield land in central areas should be prioritised for development. Fiddlers Ferry, the hospital site, Unilever and the oversupply of out of town retail sites should be considered in terms of their redevelopment potential. 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council has also undertaken additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this is now incorporated into the SHLAA. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The updated PSVLP (2021) now proposes to allocate the Fiddlers Ferry Power Station Site for development, the majority of which will come forward in the Plan Period.

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	<ul style="list-style-type: none"> • The Plan makes specific reference to the hospital site. The potential of the Unilever site has been considered through the town centre master planning process. They are considered to provide potential additional development capacity, although there is insufficient certainty at present for these sites to be included within the Council's identified residential or employment land supply. These, together with other potential brownfield sites, are part of the reason why the Council does not consider it needs to remove land from the Green Belt for 'safeguarding' for development beyond the Plan period. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
<ul style="list-style-type: none"> • Development densities for residential and employment should be increased, particularly in the town centre. 	<ul style="list-style-type: none"> • Following previous Local Plan consultations the Council has reviewed its density assumptions for the Town Centre and Inner Warrington and is reviewing its residential parking standards, recognising the potential for high density development in these locations. The Council is proposing minimum density requirements for the Town Centre and other sites that are in highly sustainable locations, together with minimum requirements for all site allocations. Similarly, the Council has given detailed consideration to the extent of employment land release as sets out in its Economic Development Needs Assessment. As such, the Council considers that the Plan's residential and employment densities will optimise the use of land in accordance with the requirements of the NPPF and will help to ensure the amount of Green Belt release required to support Warrington's development needs is minimised.
<ul style="list-style-type: none"> • Insufficient detail on infrastructure and utilities required to support level of development being proposed, the cost of the infrastructure and evidence that it is capable of being delivered in a timely manner, phased appropriately to support new development. There is a difference between having a programme for delivery of a new infrastructure and 	<ul style="list-style-type: none"> • The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the Plan. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The

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Summary of Issues Raised	Response
<p>actually having the new infrastructure in place. This difference could be influenced by Government policy, spending cuts and politics.</p>	<p>Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the Plan is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.</p>
<ul style="list-style-type: none"> • The Green Belt boundary was only confirmed about 5 years ago and was meant to last for 20 years, and yet WBC are already wanting to change the boundaries to meet their plans for new homes and employment sites. 	<ul style="list-style-type: none"> • The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development needs and demonstrated that Exceptional Circumstances exist in order to do so.
<ul style="list-style-type: none"> • The Plan is based on concepts rather than detailed proposals making it difficult to comment on. 	<ul style="list-style-type: none"> • The Plan provides a range of site specific and thematic planning policies. These are considered appropriately detailed to set a clear framework for Warrington’s development over the Plan period and to enable individual planning applications to be assessed. The Council is proposing to update its existing Supplementary Planning Documents (SPDs) and produce new SPDs when additional detail is required support the implementation of the Plan. Any revised or new SPD will be subject to further consultation. The Council also requires Development Frameworks to be prepared for the Main Development Areas to provide additional detail on the form and timescales of development. These will also be subject to further consultation.
<ul style="list-style-type: none"> • Crime, vandalism and anti-social behaviour will increase if the planned developments, and the population increase that will come with them, go ahead. 	<ul style="list-style-type: none"> • The Plan includes measures intended to minimise opportunities for crime and antisocial behaviour in Policy DC 6 ‘Quality of Place’.
<ul style="list-style-type: none"> • Greater consideration needs to be given to other major developments in neighbouring boroughs, such as Parkside in St Helens which will impact on Warrington’s road infrastructure. 	<ul style="list-style-type: none"> • The Council has prepared its Plan working closely with neighbouring Councils under the ‘Duty to Cooperate’. The Council’s Statement of Common Ground identifies a number of strategic development sites in Warrington and adjoining Council areas where Warrington has agreed specific measures to address potential cross boundary issues.

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<ul style="list-style-type: none"> • Plan does not consider the physical impact of the development of HS2 	<ul style="list-style-type: none"> • The proposed route of HS2 was taken into consideration in respect of the Council's spatial option and site assessment processes and in the Green Belt Assessment which all informed the preparation of the Updated Proposed Submission Version Local Plan.
<ul style="list-style-type: none"> • Concern over the loss of agricultural land 	<ul style="list-style-type: none"> • The quality of agricultural land was taken into account in the Council's spatial option and site assessment processes and in the Plan's Sustainability Appraisal. The Council has sought to minimise the loss of the best and most versatile agricultural land.
<ul style="list-style-type: none"> • Loss of Green Belt will result in Warrington merging with other towns 	<ul style="list-style-type: none"> • The Council's Green Belt Assessment is a key evidence base underpinning the Plan's spatial strategy. By focussing Green Belt release in the least sensitive areas and by providing strong protection the vast majority of Warrington's Green Belt that will remain, the Council is confident that the Plan will ensure Warrington does not merge with other towns. The Council considers the revised Green Belt boundaries will ensure the long term integrity of the Green Belt and will endure well beyond the end of the Plan period.
<ul style="list-style-type: none"> • Warrington will lose 11% of its Green Belt, virtually all of it in South Warrington, this is unnecessary and disproportionately spread across the Borough. The loss of Green Belt, if any is really required, should be spread more evenly and be a last resort after all other reasonable options have been examined. 	<ul style="list-style-type: none"> • The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development needs and demonstrated that Exceptional Circumstances exist in order to do so. It should be noted that amount of Green Belt proposed for release has been significantly reduced in the Updated PSVLP. • The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. • It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP and that the majority of the new homes proposed in the Plan period will

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Summary of Issues Raised	Response
	<p>be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal.</p>
<ul style="list-style-type: none"> • In considering the change to Green Belt the South Warrington area has benefited considerably over the past decades whilst other quadrants of the area have borne the brunt of development. The new Local Plan shows vision and an integrated approach to supporting growth. 	<ul style="list-style-type: none"> • Support noted. • It should however be noted that the he amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP.
<ul style="list-style-type: none"> • Concerns regarding scale of development proposed for south Warrington which will completely change the character of south Warrington and result in significant ecological impact, including loss of part of Moore Nature Reserve. Loss of Green Belt will result in urban sprawl from Grappenhall in the east to Moore in west within individual settlements in between losing their distinct identify. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities including Lymm, Grappenhall Village and Appleton Thorn. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. Where there are impacts on important ecological assets, the Plan requires extensive mitigation to offset the loss of habitat and provide an overall net increase in biodiversity. In preparing the Plan, the Council has worked closely with statutory consultees including Historic England, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard • It should be noted that the revised PSVLP (2021) is no longer proposing to allocate the South West Urban extension in proximity to Walton and Moore Village or Port Warrington which would have resulted in the loss of part of Moore Nature Reserve. In addition, the South East Warrington Urban Extension is significantly smaller than the previous Garden Suburb allocation.

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<ul style="list-style-type: none"> Proposals contravene Appleton neighbourhood plan 	<ul style="list-style-type: none"> The Council has taken the Appleton Thorn Neighbourhood Plan into account in preparing the emerging Local Plan and in particular in allocating the South East Warrington Urban Extension in the updated PSVLP. The Appleton Thorn Plan was prepared in the context of the Council's adopted Local Plan. In making representations to the Neighbourhood Plan, the Council stated that there may be a requirement for the Neighbourhood Plan to be reviewed once the new Local Plan had been prepared, given the requirement for the Council to plan positively to meet Warrington's future development needs.
<ul style="list-style-type: none"> Focusing the majority of new development in the south will increase already high levels of traffic congestion. It will put increase strain on transport infrastructure serving the town centre, which is already congested, subject to poor air quality and has the constraints of the Ship Canal, Mersey, Bridgewater Canal and Railway lines. The Plan has failed to make adequate provision for additional crossings of the Ship Canal. 	<ul style="list-style-type: none"> The Council has assessed the level of development proposed in the Plan through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network. A series of key transport infrastructure improvements are therefore required to support the proposed development allocations and the Plan as a whole. These include the Western Link, which will directly enable the development of the Waterfront area and through reducing traffic levels on the existing road network, it will facilitate a greater level of development within the Town Centre and across Inner Warrington. Similarly, development in the other Main Development Areas – including the South East Warrington Urban Extension and the South East Warrington Employment Location - cannot come forward without significant transport and social infrastructure improvements. Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. This is identified in Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.
<ul style="list-style-type: none"> Concentrating development in south Warrington will do nothing for the regeneration of the Town Centre. 	<ul style="list-style-type: none"> The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential

Spatial Strategy	
Summary of Issues Raised	Response
	<p>economic benefits of focussing development, including that proposed in south Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington.</p>
<ul style="list-style-type: none"> • Infrastructure south of the Ship Canal is particularly limited, with no rail services and limited shops, schools and community facilities. Other parts of the borough have better access to the rail network, motorways and the main employment areas. 	<ul style="list-style-type: none"> • The Council accepts that current infrastructure and services in south Warrington are not sufficient to support the level of development proposed. The proposed South East Warrington Urban Extension and the South East Warrington Employment Location are dependent on a wide range of improvements to existing infrastructure and provision of new infrastructure. This includes provision of major transport improvements, new schools, health facilities and open space. Proposals to improve accessibility to the town centre will also improve access to Warrington Bank Quay and Warrington Central Rail Stations.
<ul style="list-style-type: none"> • Locating development in South Warrington means that affordable housing will not be genuinely affordable to local people 	<ul style="list-style-type: none"> • New development in south Warrington will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council's housing waiting list. A third will be for low cost home ownership, of which the majority will be 'First Homes' specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers.
<ul style="list-style-type: none"> • The location of new homes should reflect where jobs are being created to minimise commuting. High value houses in south Warrington do not match with the low value jobs proposed. This will result in low skilled employees having to commute in from north Warrington with residents of south Warrington commuting out to Manchester and Liverpool by car. The new homes in the South West Extension will be entirely for commuters given no new jobs are being proposed in that area. More 	<ul style="list-style-type: none"> • An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area, of which the majority will be located north of the Ship Canal, the Spatial Strategy is ensuring that a large number of new homes will benefit from being in proximity to established and newly developed

Spatial Strategy	
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<p>genuinely affordable houses are needed in north Warrington where there have been major recent employment developments.</p>	<p>employment locations. Through ensuring improvements to transport infrastructure, new and existing residents in south Warrington will be able to access these employment opportunities. With regard to new employment locations, the Fiddlers Ferry allocation will provide a wide range of jobs accessible to residents of north Warrington, with the new Western Link improving access for residents of south Warrington. The South East Warrington Employment Area will provide a major new employment site in south Warrington. This will again provide a range of jobs, but the Council acknowledges that the predominant uses will be warehousing and distribution and therefore there will be a relatively large number of lower skilled jobs. This emphasises the importance of providing a wide range of housing types in the proposed south Warrington urban extensions, including provision of 30% affordable housing, to ensure that employees have the opportunity to live in close proximity to their work. The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling.</p>
<ul style="list-style-type: none"> • There will be increased HGV traffic from the proposed employment sites resulting in congestion, noise and air pollution on the local road network leading to motorway junctions. 	<ul style="list-style-type: none"> • The employment allocations in the Plan are all dependent on infrastructure improvements to the Strategic and Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts.
<ul style="list-style-type: none"> • Development should be located where there is infrastructure already in place, such as to the south of the train station at Birchwood next to the M6 where an access road can be easily added and houses could be screened from the motorway. An urban extension to the south of Birchwood station would enable new homes to access the station and facilities in Birchwood district centre. Further land is available to the east towards Manchester. 	<ul style="list-style-type: none"> • The Council considered a range of alternative locations for Green Belt release adjacent to the main urban area but none performed as well as the chosen spatial strategy. The Council did assess the potential for an urban extension to the east of the main urban area and to the south of Birchwood station. However, it was discounted as an option as it would have significant environmental and ecological impacts and potentially sterilise mineral reserves.

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<ul style="list-style-type: none"> • The number of homes being proposed for Lymm should be reduced to maintain the character of the village. The homes being proposed should be affordable. Early delivery of homes in Lymm will be harmful. 	<ul style="list-style-type: none"> • The Council considers that the number of homes being proposed in Lymm under the Spatial Strategy will ensure the character of Lymm is maintained. 30% of new homes will be affordable. The Council's assessment of infrastructure demonstrates that early delivery of homes can be achieved, subject to the expansion of one of Lymm's primary schools and the provision of a new health facility. The Updated PSVLP has however removed the Massey Brook Lane allocation as the site promoter and land owners have confirmed the site is no longer available and have requested that the site is withdrawn from the Local Plan process. This will reduce the number of homes proposed in Lymm by 60 but this is not considered to have a significant impact on the Plan's spatial strategy.
<ul style="list-style-type: none"> • Proposed development will change the character of Burtonwood from a village into a suburb of Warrington and place unacceptable pressure on its local services. 	<ul style="list-style-type: none"> • The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • The closure of Fiddlers Ferry highlights the additional levels of brownfield land that could become available. This means the amount of Green Belt release should be limited. 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council has also undertaken additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this is now incorporated into the SHLAA. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The updated Plan now allocates the Fiddlers Ferry Site for development, the majority of which will come forward in the Plan Period.

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	<ul style="list-style-type: none"> • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan
<ul style="list-style-type: none"> • Support the prioritisation of brownfield land, the focus on town centre regeneration and repopulation of inner Warrington. However concern that this prioritisation can be guaranteed. Green Belt sites in south Warrington will be released for development from 5 years into the plan period. There is a risk that developers will build on the most profitable Green Belt land first without prioritising brownfield or town centre sites as the plan intends. 	<ul style="list-style-type: none"> • Government policy (NPPF - Paragraphs 119 – 123: Making effective use of land) requires local planning authorities to maximise the use of sites within the existing urban area. However, it is not appropriate to insist that all brownfield land is developed before Green Belt can be released. Certain brownfield sites will not be able to come forward until later in the plan period due to the need for infrastructure to be delivered to support their development. The release of some Green Belt land early in the Plan period is necessary in order to help meet the requirement to identify a 5-year deliverable supply of housing land (para 68 of the NPPF).
<ul style="list-style-type: none"> • The spatial strategy is informed by the ‘call for sites’ (para 3.3.2) and not benefit the residents of Warrington 	<ul style="list-style-type: none"> • The Call for Sites exercise was a fundamental part of the preparation of evidence base for the Local Plan. It enabled the Council to understand the extent to which land across the borough is available for development. This is important to ensure that the Plan’s Spatial Strategy is deliverable. However, the spatial strategy was also informed by consultation responses to the previous adopted Local Plan, the two Regulation 18 consultations and the previous PSVLP consultation. This included a large number of representations made by Warrington residents.
<ul style="list-style-type: none"> • Warrington has the worst air quality in the whole of the UK for small particulate matter PM2.5 (WHO Air Quality Database 2018). This data has not been reported on or included in the Local Plan or its supporting documentation. 	<ul style="list-style-type: none"> • The Council carried out an Air Quality Modelling Report which assessed the air quality impacts of the previous PSVLP. This included specific consideration of particulate matter. • The Council has updated its Transport Model to reflect the changes made in the updated PSVLP. From this, further air quality modelling work has been undertaken to inform the updated Habitats Regulation Assessment.
<ul style="list-style-type: none"> • Oppose a Local Plan which will massively increase the levels of traffic and HGV's. Air Quality is a major issue in Warrington with the Town identified by the World Health Organisation as being in the top 5 Towns/ Cities in 	<ul style="list-style-type: none"> • The proposed employment allocations and urban extensions in the Plan are all dependent on infrastructure improvements to the Strategic and

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<p>England that exceeds the pollutants limit. It is therefore very likely that the proposed new housing in South Warrington (circa 7000 dwellings) , together with the Six/56 and Stobart’s developments will have a deleterious effect upon air quality and noise , particularly in existing congested locations such as Stockton Heath high street and Latchford village.</p>	<p>Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts.</p> <ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • The Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the updated PSVLP is proposing a lower level of development. The existing report is therefore considered to assess a ‘worst case’ scenario. Updated air quality modelling has however informed the updated Habitats Regulation Assessment. • Most importantly in the context of the Local Plan, planning applications will be closely scrutinised to ensure that air quality has been appropriately considered, to ensure that opportunities to improve air quality are not missed, and to ensure that developments that could have a significant detrimental impact are not approved.
<ul style="list-style-type: none"> • Much of the loss of Green Belt land is in the south with significant impacts for this part of the Borough. There should be a more equitable spread across the Borough. 	<ul style="list-style-type: none"> • The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development needs and demonstrated that Exceptional Circumstances exist in order to do so. The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meetings Warrington’s development needs as part of the Plan’s overall Spatial Strategy whilst ensuring the long term integrity of Warrington’s Green Belt.

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	<ul style="list-style-type: none"> It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP and that the majority of the new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal.
<ul style="list-style-type: none"> There is no sound or logical connection between aspirational growth and the spatial plan. Plans for growth in the south of the Borough will not benefit the town centre and are contrary to the Council's regeneration aspirations. The proposed urban extensions in south Warrington, the Garden Suburb and South West Urban Extension, both have a distinct lack of connectivity with central Warrington and are furthest from rail links. When the already consented sites in the Garden Suburb are added to that proposed in the Green Belt, something like 40% of new homes built during the plan period will be remote from the town centre. 	<ul style="list-style-type: none"> The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential economic benefits of focussing development, including that proposed in south Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington. Proposals to improve accessibility to the town centre will also improve access to Warrington Bank Quay and Warrington Central Rail Stations.
<ul style="list-style-type: none"> The Plan's housing strategy places a major emphasis upon creating two major residential settlements (Garden Suburb and SWUE) which are both South of the three waterways. In complete contrast the LPT4 openly admits that the preponderance of workplaces, such as Lingley Mere, Omega, Town Centre, Railway Stations, Gemini/Winwick Road Retail Park, Woolston Grange and Birchwood Science Park are north of the Three Waterways. The type of employment proposed in south Warrington which will employ low skilled/low paid workers who will not be able to afford even the cheapest homes and will therefore need to commute from north Warrington. This mismatch is wholly illogical and is a recipe for growing and increasing intractable highway congestion. 	<ul style="list-style-type: none"> An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area, of which the majority will be located north of the Ship Canal, the Spatial Strategy is ensuring that a large number of new homes will benefit from being in proximity to established and newly developed employment locations. Through ensuring improvements to transport infrastructure, new and existing residents in south Warrington will be able to access these employment opportunities. With regard to new employment locations, the Fiddlers Ferry allocation will provide a wide range of jobs accessible to residents of north Warrington, with the new Western Link improving access for residents of south Warrington. The South East Warrington Employment Area will provide a major new employment site in south Warrington. This will again provide a range of jobs, but the Council acknowledges that the predominant uses will be

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	<p>warehousing and distribution and therefore there will be a relatively large number of lower skilled jobs. This emphasises the importance of providing a wide range of housing types in the proposed south Warrington urban extensions, including provision of 30% affordable housing, to ensure that employees have the opportunity to live in close proximity to their work. The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling.</p>
<ul style="list-style-type: none"> • The proposed release of Green Belt in south Warrington means that the character of this part of the town will be dramatically changed. Currently each village has its own character. After the building of the Garden Suburb, each village will have merged into the next. The case has not been made for the re-designation of Green Belt in south Warrington. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities including Lymm, Grappenhall Village and Appleton Thorn. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. • It should be noted that the revised PSVLP is no longer proposing to allocate the South West Urban extension in proximity to Walton and Moore Village or Port Warrington which would have resulted in the loss of part of Moore Nature Reserve. In addition, the South East Warrington Urban Extension is significantly smaller than the previous Garden Suburb allocation.
<ul style="list-style-type: none"> • South Warrington has neither the infrastructure nor geographical layout to sustain the level of development proposed. The Plan states that there is the ability to provide new and improved infrastructure to support employment and growth in the areas chosen. However, there is no planned infrastructure for Warrington South in the Plan. 	<ul style="list-style-type: none"> • A series of key transport infrastructure improvements are required to support the proposed development allocations in south Warrington and the Plan as a whole. These include the Western Link, which will directly enable the development of the Waterfront area and through reducing traffic levels on the existing road network, it will facilitate a greater level

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	<p>of development within the Town Centre and across Inner Warrington. Similarly, development in the South East Warrington Urban Extension and the South East Warrington Employment Location cannot come forward without significant transport and social infrastructure improvements. Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. This is identified in Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.</p>
<ul style="list-style-type: none"> No evidence is provided that 1,100 houses are needed in outlying communities. Culcheth, Glazebury and Croft are thriving as communities and there is plenty of market housing currently available including 3 and 4-bed and larger houses. While much of this is 'unaffordable', there is no evidence that additional supply of market houses makes homes more affordable. Allocations in the settlements suggest the sites should contribute to the Borough's 'general ... housing needs, including family homes with gardens'. These are exactly the sort which attract car commuters, and which are in current plentiful supply in these location. This will encourage the products provided by national volume builders, to the detriment of genuine local need. There may well be a local need for housing other than market housing in the plan period. This could be for older or younger people who want to stay in the area, or genuinely affordable housing that is available in perpetuity. This need could constitute the 'very exceptional circumstances' needed to approve an application in the Green Belt in which case the Green Belt boundary should be left in the current position. 	<ul style="list-style-type: none"> The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements. New development will increase housing choice, provide affordable housing and support the viability of local services.
<i>Landowners/Developers</i>	
<ul style="list-style-type: none"> The approach to focus the majority of new development within, and around the edges of, the urban area of Warrington is supported by a number of developers, in the context that Warrington is the largest 	<ul style="list-style-type: none"> Support noted.

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<p>settlement in the Borough and is the principal focus of services and facilities and public transport connections. The potential for new development adjacent to the existing urban area to contribute to removing existing highway network and social infrastructure capacity constraints is also recognised by developers promoting sites in those locations.</p>	
<ul style="list-style-type: none"> • Developers promoting sites within the Main Development Areas are supportive of the spatial strategy and consider it is consistent with national policy, which recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, including significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. The spatial strategy will ensure that the permanency of the revised Green Belt boundary will endure well beyond the Plan period whilst at the same time allowing land to come forward that is required to meet local housing need and support economic growth and local services/ amenities 	<ul style="list-style-type: none"> • Support noted. • It should be noted however that the updated PSVLP is no longer proposing to allocate the South West Urban Extension or Port Warrington and the Business Hub within the wider Waterfront allocation. The South East Warrington Urban Extension is also significantly smaller than the previous Garden Suburb allocation.
<ul style="list-style-type: none"> • Developers promoting employment sites identified in the Plan are supportive of the approach to Fiddlers Ferry Power Station being a longer term (post Plan period) opportunity. 	<ul style="list-style-type: none"> • Support noted. • It should be noted however that the updated Plan now allocates the Fiddlers Ferry Site for employment and residential development, the majority of which will come forward in the Plan Period.
<ul style="list-style-type: none"> • A number of developers consider that the Plan is too heavily reliant on delivery of housing on brownfield sites in the existing urban area and additional Green Belt should therefore be allocated. 	<ul style="list-style-type: none"> • The NPPF requires the Council to make as much use as possible of suitable brownfield sites and underutilised land (para 137a). To ensure it meets this requirement, the Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its brownfield register, both of which are updated on an annual basis. The Council has also undertaken additional masterplanning work in the town centre and surrounding area to identify additional brownfield capacity. This masterplanning work has

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	<p>been incorporated into the SHLAA, enabling each site to be assessed in terms of availability and deliverability. The Council is therefore confident that the brownfield component of the Plan's housing and employment land supply is capable of being delivered.</p>
<ul style="list-style-type: none"> Developers promoting sites outside of the Main Development Areas have raised concerns that the spatial distribution of the plan is unbalanced and unjustified. They consider the allocated sites are overwhelmingly concentrated to the south of Warrington and to the west of the M6. In their view the south of Warrington suffers from a lack of public transport and the spatial option does not appear to promote patterns of sustainable development. They consider the Plan does not make sufficient provision for housing growth in the north of the Borough where a significant proportion of Warrington's key employment areas are located. A more even pattern of distribution would in their view respond more effectively to demand and ensure that the surrounding infrastructure has the capacity to accommodate such development. 	<ul style="list-style-type: none"> The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. It should be noted that whilst the majority of Green Belt release is proposed south of the Ship Canal, the majority of the total number of new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal. This continues the trend over recent years where the majority of new development in Warrington has taken place north of the Ship Canal. The Council considers that the Spatial Strategy ensures new homes will be provided in proximity to established, new and proposed employment developments, promoting sustainable transport patterns. The Council acknowledges that new and improved infrastructure is required to support the proposed development allocations, particularly in south Warrington. Through its updated Local Plan Viability Assessment, the Council has demonstrated that this infrastructure is capable of being delivered.
<ul style="list-style-type: none"> Developers promoting sites outside of the Main Development Areas have raised the concern that The Plan places too much reliance on the delivery of a few very large sites. They consider these sites have longer lead in times, greater infrastructure requirements and represent a risk to the Plan if one or more of these sites do not come forward as envisaged. There are concerns regarding unknown and un-costed infrastructure improvements for these sites and the achievability of assumed delivery 	<ul style="list-style-type: none"> The NPPF recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, including significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (para 72). This is reflected in the results of the spatial options assessment and SA/SEA which has informed the Plan's Spatial Strategy. The Council acknowledges that a large number of respondents raised

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<p>rates. In their view, a wider diversity of site allocations is needed to deliver the requirements over the plan period. This means consideration should be given to, small and medium sized sites - on the periphery of Warrington and the outlying settlements – and / or smaller settlement expansions which are less critically reliant on major highways improvements prior to the commencement of development and are capable of being brought forward in the early years of the Plan</p>	<p>concerns over whether the infrastructure required to support the Main Development Areas can be delivered. The Council has subsequently undertaken the preparation of a full revised Local Plan Viability Assessment. As part of this work, the Council has reviewed all infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. This work demonstrates that the infrastructure required to deliver these sites is capable of being delivered. The Council recognises that the Main Development Areas will have relatively long lead in times. As such the Plan proposes a stepped trajectory, which is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The Spatial Strategy already ensures additional sites will come forward from the proposed Green Belt release in the outlying settlements early in the Plan Period. The Council also recognises a degree of risk associated with a large proportion of development being proposed within the 4 Main Development Areas. This is reflected in the benchmark flexibility factor in the land supply of 10% - which equates to a similar size to one of the Plan’s large allocation sites – and the inclusion in the Plan of a review mechanism should housing land supply not be delivered in accordance with the planned trajectory.</p> <ul style="list-style-type: none"> • The updated PSVLP also includes an additional site at Thelwell Heys which will deliver additional homes early in the Plan Period, complementing the larger development sites without having a material impact on the functioning of Warrington’s Green Belt.
<ul style="list-style-type: none"> • Developers promoting sites outside of the Main Development Areas also identify that none of the proposed residential allocations are close to railway lines, where new stations might be built in future years. It is therefore argued that to future-proof the Local Plan, some of the allocations should adjoin existing railway lines (eg. along the Warrington to Newton-le-Willows railway line). This is particularly relevant for Green 	<ul style="list-style-type: none"> • The Local Plan closely reflects the Council’s new Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas and other allocations in the Plan are able to be well served by public transport. A key focus of transport infrastructure investment is to improve the accessibility of the town centre by sustainable modes. This

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<p>Belt land release, to reflect para 138 of the Framework which gives first consideration to land which is well served by public transport.</p>	<p>will also improve access to Warrington Bank Quay and Warrington Central Rail Stations.</p>
<ul style="list-style-type: none"> • Developers promoting sites in the outlying settlements consider that the Council's selection of a strategy of incremental growth within the Outlying Settlements is based on unsubstantiated and incomplete evidence and a flawed approach to the appraisal of spatial options. Developers consider the Council has made a number of flawed conclusions regarding the adverse impacts of supporting a higher level of growth within the Outlying Settlements and has attempted to do so without reference to specific sites and development proposals as required to fully understand such impacts and the realistic growth capacity of these settlements. In their view the Council has presented no evidence to define the development needs of the Outlying Settlements and establish how much housing they need to accommodate to achieve a viable future. They consider the 10% growth proposal is entirely arbitrary and is wholly unproven to be sufficient in this regard. 	<ul style="list-style-type: none"> • The Council has assessed options for varying levels of growth in the outlying settlements. The options assessment process has taken into account existing infrastructure within each of the settlements and has been undertaken working closely with other Council teams and partner agencies responsible for service provision. This has included the Council teams responsible for education, parks and open spaces, transportation, culture and leisure and public health, together with the Warrington Clinical Care Commissioning Group and other NHS services operating in the borough. The Council has also engaged with statutory consultees including Natural England, the Environment Agency, Highways England, Historic England and United Utilities in developing the spatial strategy of the Plan. Given the relatively small geographic extent of the borough and the dominance of the main urban area, development needs have primarily been considered at a borough-wide level. The Council does not consider it is practical to undertake detailed housing, employment and retail needs assessments for each individual settlement. There is however scope for this to be undertaken by neighbourhood planning groups in preparing more detailed neighbourhood plans. As such the Council considers that the options assessment process it has undertaken has been thorough and proportionate to the level of detail required to prepare a Local Plan. The evidence collated to support the area profiles and options appraisal work concluded that growth in the order of 10% in the Outlying Settlements can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. A planning judgement has been made that this level of development would not change the character of the settlements to the same extent as a larger settlement extension, the next level of growth that was considered as part of the assessment process. Specific consideration was

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	<p>given to sites submitted as part of the 'call for sites' exercise in undertaking the high level spatial options assessment. The final allocation of sites in the outlying settlements has been based on detailed site assessments and infrastructure capacity and not strictly limited to 10%.</p>
<ul style="list-style-type: none"> • Developers criticised the Council for having failed to appraise the Spatial Options in the context of a higher housing requirement. If it had, they believe it would find that Spatial Option 3 (or a moderated version of it) would not conflict with strategic objectives of the PSLP in the manner reported when this is considered against the PSLP housing requirement. 	<ul style="list-style-type: none"> • The Council assessed higher levels of housing growth at the Regulation 18 consultation stage. Taking into account the conclusions of the Regulation 18 SA/SEA, the responses to the Regulation 18 consultations and having undertaken more detailed evidence base work relating to economic growth in the both the LHNA and the EDNA, the Council does not consider that a higher housing requirement to those assessed is a reasonable option. Such a scenario was therefore not taken forward for consideration in the preparation of the previous Proposed Submission Version Local Plan and has not been assessed in the preparation of the Updated Proposed Submission Version Local Plan.
<ul style="list-style-type: none"> • Developers promoting sites adjacent to 'washed over' settlements consider there is a requirement to look at the needs of smaller villages, including an assessment of whether such villages should be inset within the Green Belt or washed over. 	<ul style="list-style-type: none"> • The Council does not consider there has been any material change in any of the washed over Green Belt settlements that would alter the rationale for their classification following the adoption of the Local Plan Core Strategy in 2014. Given the limit size of the washed over settlements and their lack of service provision, the Council does not consider that these are sustainable locations for development. There are a limited number of washed over settlements which have either been removed from the Green Belt or have had their boundaries revised as a consequence of Green Belt boundary changes in respect of the main urban area.
Statutory Consultees	
<ul style="list-style-type: none"> • St Helens Council supports the references to the 'Omega Westward Extension' in paragraph 3.3.21. This approach is consistent with 'duty to co-operate' discussions held between St Helens and Warrington Councils. It also accords with the St Helens Borough Local plan: Submission Draft (January 2019) which includes this area as a site allocation for employment uses. Request that further consideration be given to how 	<ul style="list-style-type: none"> • Support Noted. The Council has identified a number of measures in the Local Plan and in its new Local Transport Plan (LTP4) to improve the accessibility of its key development locations including Omega, in particular by sustainable transport modes.

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the accessibility of Omega in general could be improved for St Helens residents.	
Other	
<ul style="list-style-type: none"> • The Transpennie Trail (TPT) would welcome the opportunity to be involved in consultations regarding the proposed housing development areas on/near the TPT, in terms of the sustainable transport offer. Segregated pedestrian and cycle routes must be fully accessible for all. The term ‘accessible’ should be included to demonstrate commitment to providing fully accessible routes. 	<ul style="list-style-type: none"> • The Council will ensure it consults TPT in respect of future developments / applications in the vicinity of the TPT.
<ul style="list-style-type: none"> • It is understood that the final alignment for Western Link has been announced but unfortunately this information has not been supplied to the TPT national office, despite responding to all consultations. It is essential that the TPT national office is included in further discussions on this proposal. 	<ul style="list-style-type: none"> • The Council is committed to consulting TPT on all future consultations.
<ul style="list-style-type: none"> • People who work in Warrington are concerned that focusing the majority of new development in the south will put increased strain on those residents accessing the town centre from this location, which is already congested. Increased use of the Ship Canal will further contribute to these problems when the swing bridges open. Roads in south Warrington are already congested, worse when there is an incident on one of the 3 major motorways. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Plan through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network. A series of key transport infrastructure improvements are therefore required to support the proposed development allocations and the Plan as a whole. These include the Western Link, which will directly enable the development of the Waterfront area and through reducing traffic levels on the existing road network, it will facilitate a greater level of development within the Town Centre and across Inner Warrington. Similarly, development in the other Main Development Areas – including the South East Warrington Urban Extension and the South East Warrington Employment Location - cannot come forward without significant transport and social infrastructure improvements. Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. This is identified in Local

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	<p>Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.</p>
<ul style="list-style-type: none"> Residents from neighbouring boroughs do not believe that there is justification or exceptional circumstances for development planned in south Warrington and consider that the Plan is too ambitious. There are concerns about the impact on Green Belt, infrastructure, local services (including the hospital), air quality, public health and wellbeing and wildlife – in particular through the loss of Moore Nature Reserve. It is considered that Fiddlers Ferry should be used as a prime site for employment land. If St. Helens have reduced their housing plans then it is reasoned that Warrington should do so as well. 	<ul style="list-style-type: none"> The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development needs and demonstrated that Exceptional Circumstances exist in order to do so. This has included a detailed assessment of brownfield capacity, including the development potential of Fiddlers Ferry which is now an allocation site. In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities including Lymm, Grappenhall Village and Appleton Thorn. It should be noted that the updated PSVLP is no longer proposing to allocate the South West Urban extension in proximity to Walton and Moore Village or Port Warrington which would have resulted in the loss of part of Moore Nature Reserve. In addition, the South East Warrington Urban Extension is significantly smaller than the previous Garden Suburb allocation. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. Where there are impacts on important ecological assets, the Plan requires extensive mitigation to offset the loss of habitat and provide an overall net increase in biodiversity. In preparing the Plan, the Council has worked closely with statutory consultees including Historic England, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the

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	<p>required standard. Development in south Warrington is dependent on a wide range of improvements to existing infrastructure and provision and new infrastructure, including provision of major transport improvements, new schools, health facilities and open space. The Council has also given detailed consideration to impacts on air quality in its Local Plan Air Quality Modelling Report.</p>

Key Diagram	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The proposed Local Plan (Figure 3 - Local Plan key diagram) is very vague in respect of improved routes into central Warrington. 	<ul style="list-style-type: none"> The Key Diagram provides a visual illustration of the Local Plan's Spatial Strategy and it is not intended to show such fine grain detail as improved transport corridors into central Warrington.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> Support approach to Garden Suburb, specifically in relation to the Garden Suburb Main Development Areas and the Garden Suburb Proposed Employment Area. 	<ul style="list-style-type: none"> Comments duly noted. It should be noted that changes have been made to this allocation in the updated PSVLP.
<ul style="list-style-type: none"> The key on the Key Diagram is not consistent with all of the annotations on the diagram. The key on the Key Diagram should be expanded to include the land to be removed from the Green Belt in the smaller settlements. 	<ul style="list-style-type: none"> Comments duly noted and it is acknowledge that there is a slight colour discrepancy between the key for Inner Warrington and the one used on the actual map. Land to be removed from the Green Belt in the settlements is shown on the Map at Figure 6 (Amended Green Belt Boundaries) of the PSVLP (2019) and the updated PSVLP.
Statutory Consultee	
<ul style="list-style-type: none"> Figure 3 – Local Plan Key Diagram is useful to illustrate the proposed spatial strategy but would benefit from some labels on the map, for example road names. 	<ul style="list-style-type: none"> Comments duly noted; however, given the nature and level of detail already on the map and it is to show visually the Plan's Spatial Strategy, it is not considered that naming road and features would be appropriate for a map of this purpose.
Other	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">

Objective W1 To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:

- **delivering a minimum of 18,900 new homes (equating to 945 per year) between 2017 and 2037, and**
- **supporting Warrington’s ongoing economic success by providing 362 Hectares of employment land between 2017 and 2037.**

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<i>Residents</i>	
<ul style="list-style-type: none"> • The plan is based on out of date housing figures and should be based on the lowest figures. 	<ul style="list-style-type: none"> • In determining Warrington’s housing requirement, the Council has followed the Government’s Standard Housing Methodology and associated Planning Practice Guidance. The Updated Proposed Submission Version Local Plan (2021) proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. It should be noted that the Government’s standard methodology requires the Council to use the 2014 based household projections in calculating the minimum housing need figure.
<ul style="list-style-type: none"> • The economic growth figures are exaggerated and are not justified as this sort of growth have never been achieved. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2021) using data which post-dates the EU Brexit referendum. The Council no longer considers the previous scale of jobs growth to be realistic. However, the Council is confident the amount of land being proposed for employment uses in the updated PSVLP (2021), based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations.
<ul style="list-style-type: none"> • Concerns that the plan is focused on growth at the expense of existing residents and that existing residents will be dis-benefited through a decrease in their environmental amenity. 	<ul style="list-style-type: none"> • The Vision of the Plan is to take the opportunity to positively plan for new homes, jobs and businesses through improvements to infrastructure that will benefit both existing and future residents of the town. The Plan looks to maintain the character of Warrington’s places and create new parks and green links that will create new leisure opportunities and improve sustainable transport links. Ambitions through policy will see more recycling facilities and the introduction of low/zero carbon technology opportunities in new developments

Objective W1 To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:

- **delivering a minimum of 18,900 new homes (equating to 945 per year) between 2017 and 2037, and**
- **supporting Warrington’s ongoing economic success by providing 362 Hectares of employment land between 2017 and 2037.**

Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The housing delivery rate is not achievable as it is clearly not been met historically. 	<ul style="list-style-type: none"> • The revised Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. This compares to a requirement of 945 per annum proposed in the previous Proposed Submission Version Local Plan. The Council considers the revised housing requirement is ambitious but achievable. The Council acknowledges the recent relatively low level of housing completions. When considered over a 20 year period, Warrington’s average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council’s housing target was only 380 per annum up to 2014. The Council’s housing trajectory projects an increase in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will establish a housing land supply to support the Plan’s housing requirement over the Plan period as a whole.
<p><i>MP, Local Borough, Town or Parish Councillor</i></p>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
<p><i>Landowner/Developer</i></p>	
<ul style="list-style-type: none"> • Approach to housing is supported. 	<ul style="list-style-type: none"> • Support noted • It should be noted however that the revised PSVLP (2021) proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan.

Objective W1 To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:

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Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Object to omission of ‘a minimum of ...’ in respect of employment land provision 	<ul style="list-style-type: none"> • The Objective reflects Warrington’s objectively assessed need for employment land, including a 3 year buffer.
<ul style="list-style-type: none"> • The following text should be deleted ‘through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of sustainable neighbourhoods’ this is a general policy setting out minimum growth targets for the plan period. Other detailed policies will deal with how this growth is to be achieved. These words should be deleted. 	<ul style="list-style-type: none"> • Previous Plans have been successful in promoting the ongoing regeneration of the inner area of the town, this remains a priority. The objective will ensure that development on released Green Belt land complements rather than competes with development in the existing urban area and that new infrastructure investment will benefit the borough as a whole.
<p>Statutory Consultees</p>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
<p>Other</p>	
<ul style="list-style-type: none"> • The Council for the Protection of Rural England (CPRE) support the Vision set out but would like to see the Bruntwood definition of sustainable development included in the plan. This is “Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.’ 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) follows the latest government guidance in the NPPF on planning for sustainable development and addressing climate change. • The Council has strengthened the vision in the updated PSVLP (2021) to give greater emphasis to climate change and biodiversity. This follows the Council declaring a Climate Emergency in 2019 and an Ecological Emergency in 2020.

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Residents	
<ul style="list-style-type: none"> Plans for housing and economic growth are not realistic given economic uncertainty. There is no justification for the housing number which exceeds the government calculation. The Council has inflated the requirements for housing land taking the most favourable forecasts and applying significant uplifts. The economic forecasts which have informed the housing target are heavily reliant on the LEP and Atlantic Gateway Partnership - both of which are heavily influenced by developers and are effectively untested growth aspirations. The outcome of the BREXIT issue, and the length of time it takes to reach a conclusion, will have significant effects on the economic climate of our country and on the numbers of people coming to Britain to live. This applies equally to the Council's estimate for the requirement for employment land. 	<ul style="list-style-type: none"> In determining Warrington's housing requirement, the Council has followed the Government's Standard Housing Methodology and associated Planning Practice Guidance. The Updated Proposed Submission Version Local Plan (2021) proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period. The Council is confident that setting the housing requirement of the Plan to the minimum requirement under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the previous proposed target.
<ul style="list-style-type: none"> The basis on which the number of homes required has been calculated is flawed. The economic growth projections have been reverse-engineered from the desired housing numbers, not used to drive the housing numbers as should be the case. The view taken is clearly one of 'housing will create economic growth'. Building of new houses is not a driver for development. The drivers are employment, health care, education, ease 	<ul style="list-style-type: none"> The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 – in line with the Government's Standard Housing Methodology - will result

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<p>of transport all of which need to be delivered to see if new housing is needed.</p>	<p>in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.</p>
<ul style="list-style-type: none"> • The proposed employment allocations in the Plan, predominantly based on distribution and logistics, will not result in the level of jobs that has been used to justify the uplift in the housing target. 	<ul style="list-style-type: none"> • Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the town centre and the Waterfront. • Through the update of the EDNA (2021), the Council has however revised down its estimate of future jobs growth.
<ul style="list-style-type: none"> • The Plan's housing target is based on employment growth and not on locally arising need. There is no demand for additional housing in the area for local jobs. It is already the case that a large number of the recently built houses are occupied by people who commute into Manchester or Liverpool. There is therefore no particular logic to increasing the scale of housing in South Warrington simply to grow the commuter village, traffic problems and strain on public services that already exist. The jobs that are purported to be created from additional warehousing and logistics will be far less than proposed (due to automation over the timeline of the plan). Also the majority of people in the jobs that are created are unlikely to live in the area, preferring to commute from a larger home in lower priced nearby locations, thereby adding further to traffic problems. There is simply no connection between proposed job creation and the housing need in reality. This appears to be a fiction created for planning purposes only. There is no meaningful economic strategy for the town which would support needing to build this amount of housing. 	<ul style="list-style-type: none"> • The Council considers that the Plan's housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the borough. If the Plan was to provide for a lower number of homes then it is likely that this will result in increased commuting into the borough, increasing congestion on Warrington's transport network and risking worsening air quality on some of the busier transport corridors where people live. It is also likely to increase housing pressures in Warrington and in neighbouring authorities. The Plan proposes a range of housing types, including a substantial provision of affordable housing, to reflect to range of jobs that will be created in Warrington over the Plan period. • It should be noted however that the through the update of the EDNA (2021), the Council has revised down its estimate of future jobs growth and is confident that a housing target of 816 – in line with the Government's Standard Housing Methodology - will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.
<ul style="list-style-type: none"> • The Secretary of State has confirmed that the Standard Housing methodology is the starting point and the housing target to be included in a Local Plan should be decided locally. Councils are permitted to 	<ul style="list-style-type: none"> • The standard housing methodology defines the minimum housing requirement for a Council's area. The updated PSVLP (2021) is proposing

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<p>reduce housing numbers where towns and cities are constrained. Given Green Belt and infrastructure constraints, Warrington should reduce its housing number.</p>	<p>to meet this requirement but is no longer proposing an additional uplift, based on revised estimates of jobs creation over the Plan Period.</p> <ul style="list-style-type: none"> • The Council has demonstrated that the infrastructure required to support a housing target in line with the standard housing methodology is capable of being delivered and that areas of Green Belt can be released without compromising the overall function of Green Belt across the borough and the wider sub-region. It should be noted that all neighbouring boroughs have either released Green Belt in their adopted Plans or are currently preparing Plans which are proposing to do so. As such, in considering the Presumption in Favour of Sustainable Development, as set out in paragraph 11 of the NPPF, the Council does not consider there are any strong reasons for restricting the overall scale of development in the plan area.
<ul style="list-style-type: none"> • Housing development and infrastructure should work together however this is unlikely with the current schedule. The standard figure will not consider future demands on existing primary schools which would add pressure to our services. The Plan should be amended to allow staggered development over the Plan period to allow services time to identify and resolve infrastructure needs and to reduce risks of oversupply in delivering new housing. 	<ul style="list-style-type: none"> • The Plan is based on a detailed assessment of the Borough's existing infrastructure and the new and improved infrastructure required to support the proposed level of growth. The Plan has specific policy requirements to ensure that infrastructure improvements are coordinated with new development. This is also reflected in the Plan's stepped housing trajectory which proposes a lower level of development in the early years of the Plan to reflect the lead in times to deliver required infrastructure.
<ul style="list-style-type: none"> • 2014 projections are out of date and subsequent data show lower numbers required. If the 2016 population projections were used, there would be a much lower housing requirement. 	<ul style="list-style-type: none"> • The Council has used the 2014 Based Household Projections to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance.
<ul style="list-style-type: none"> • The Plan assumes figures for 2017-2027 for 909 average dwellings applicable from 2027-2037 when ONS projections for the second period of the plan suggest a decreasing growth rate in Warrington. Using the same calculations for the second period of the plan shows that the need reduces by 201 dwellings per annum. Over the full twenty years, the 	<ul style="list-style-type: none"> • The Council has used the first ten years of the Plan period to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance.

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average annual need for houses in Warrington is shown to be 809 not 909 i.e. 11% reduction.	
<ul style="list-style-type: none"> • The population increase will be 13% with the majority being an increase in over 65 years old, not requiring large houses and employment. 	<ul style="list-style-type: none"> • As set out in its Local Housing Needs Assessment, the Council has given detailed consideration to the age groups within the population in establishing its housing requirement.
<ul style="list-style-type: none"> • The housing market in Warrington is healthy, there are no areas where there are people struggling to move into, and there is a good supply of rental properties empty. 	<ul style="list-style-type: none"> • The Council is planning for a housing requirement to address identified issues of housing affordability in Warrington - as evidenced in the Local Housing Needs Assessment - and to ensure that that sufficient homes are provided to support the planned level of economic growth.
<ul style="list-style-type: none"> • There is no evidence of a joined up approach into how Warrington's plan connects with the plans of neighbouring councils. The Local Housing Needs Assessment and Employment Land Forecasts do not seem to take into account the effect of the successful regeneration of Manchester and Liverpool will have on the future demand for residential and employment land in Warrington. 	<ul style="list-style-type: none"> • The Council has established its housing requirement working closely with neighbouring boroughs through the 'Duty to Cooperate'. This is evidenced in the Council's Statement of Common Ground and Duty to Cooperate Statement.
<ul style="list-style-type: none"> • Proposed number of new homes is way above the level which Warrington has historically delivered. Past delivery rates are around 500 homes a year. The peak level of required housing over the Plan period is over 1,500 pa. 	<ul style="list-style-type: none"> • The Updated Proposed Submission Version Local Plan (2021) proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. The Council considers the revised housing requirement is ambitious but achievable. The Council acknowledges the recent relatively low level of housing completions. However, when considered over a 20 year period, Warrington's average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council's housing target was only 380 per annum up to 2014. The Council's housing trajectory projects an increase in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will

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	<p>establish a housing land supply to support the Plan's housing requirement over the Plan period as a whole.</p>
<ul style="list-style-type: none"> • Another reason why Warrington's house building might suddenly slow is that currently 91.4% of all the town's new builds are part financed by 'Help to buy' but this ends in 2023 but starting in 2021 it will be available only to first-time buyers and a cap on properties over £224,400 for the town. 	<ul style="list-style-type: none"> • The 'Help to Buy' is only one of a number of national and local initiatives aimed at helping people into home ownership and increasing the supply of new homes.
<ul style="list-style-type: none"> • The flexibility factor of 10% is excessive and not required given the Plan is to be reviewed every 5 years. 	<ul style="list-style-type: none"> • It is necessary to include provision for flexibility on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward. The Council has used a benchmark of 10% which it considers provides sufficient flexibility in the context of the Plan's proposed housing land supply. The flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.
<ul style="list-style-type: none"> • The Plan period of 20 year is in excess of what is required by Government and should be reduced to minimise the loss of Green Belt. 	<ul style="list-style-type: none"> • The Plan period is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption. The Council has however re-based the updated Proposed Submission Version Local Plan with a start date of 2021. This results in a total Plan Period of 18 years.
<ul style="list-style-type: none"> • The housing requirement should not be applied retrospectively to 2017, 2018 and indeed to the current year 2019. 	<ul style="list-style-type: none"> • Given the Council is re-establishing its housing requirement and is re-running its Regulation 19 consultation, the Council is rebasing its Plan period to run from 2021 to 2038, inclusive. As such the Council will not be applying the housing requirement to earlier years. This is in line with the PPG which states that for councils using the standard methodology to define their minimum housing requirement, there is no need to consider historical backlog as this is accounted for in the affordability uplift (PPG Housing and economic needs assessment, para 11).
<ul style="list-style-type: none"> • Object to including provision for development on Green Belt land for beyond the Plan Period. 	<ul style="list-style-type: none"> • In order to ensure the permanence of the amended Green Belt boundaries, in accordance with the requirement of the NPPF, the Council

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	<p>needs to consider development beyond the plan period. In addition, given the Council is promoting major urban extensions as part of its spatial strategy, the Council has given consideration to an overall timescale of 30 years in accordance with paragraph 22 of the NPPF which requires Council's to provide a longer term vision when promoting such forms of development.</p>
<ul style="list-style-type: none"> • There are Brownfield sites likely to be released within the 20 year period of the plan which have not been taken into consideration, including Fiddlers Ferry Power Station and Warrington Hospital. These areas could make a significant contribution to the town's housing needs so that Green Belt release could be minimised. 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council has also undertaken additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this is now incorporated into the SHLAA. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The updated PSVLP (2021) now allocates the Fiddlers Ferry Site for development, the majority of which will come forward in the Plan Period. • The Plan makes specific reference to the hospital site. The potential of other major brownfield sites such as the Unilever site have also been considered through the town centre master planning process. They are considered to provide potential additional development capacity, although there is insufficient certainty at present for these sites to be included within the Council's identified residential or employment land supply. These, together with other potential brownfield sites, are part of the reason why the Council does not consider it needs to remove land from the Green Belt for 'safeguarding' for development beyond the Plan period. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.

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<ul style="list-style-type: none"> • Every effort should be made to bring existing empty properties back into residential use together with vacant space above shops. 	<ul style="list-style-type: none"> • The Local Plan contains policies which support bringing empty properties back into use and which support residential development in the town centre and other shopping centres, including vacant space above shops. The Council's Local Housing Needs Assessment has given consideration to the number of vacant properties in the borough.
<ul style="list-style-type: none"> • Achieving a higher housing density in the town centre (such as apartments) of up to 40 dwellings per hectare could mean a lower density could be achieved elsewhere in the plan. This would have the advantage of requiring less Green Belt land. 	<ul style="list-style-type: none"> • Following previous Local Plan consultations the Council has reviewed its density assumptions for the Town Centre and Inner Warrington and is reviewing its residential parking standards, recognising the potential for high density development in these locations. The Council is proposing minimum density requirements for the Town Centre and other sites that are in highly sustainable locations, together with minimum requirements for all site allocations. As such, the Council considers that the Plan's residential densities will optimise the use of land in accordance with the requirements of the NPPF and will help to ensure the amount of Green Belt release required to support Warrington's development needs is minimised.
<ul style="list-style-type: none"> • If the development is predominantly on Green Belt land then the council should be ensuring that this development is kept to a minimum and therefore the calculations used should ensure the lowest yearly build total and for the shortest legally proposed period. This would then allow the council to be more flexible in its future planning if the need for housing reduces in the coming years but also will preserve Green Belt for future release should there be a greater need. 	<ul style="list-style-type: none"> • In determining Warrington's housing requirement, the Council has followed the Government's Standard Housing Methodology and associated Planning Practice Guidance. The Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. • The Plan period of 2021 to 2038 ensures the Council is able to meet the minimum requirement of extending 15 years following the date of adoption of the Plan.
<ul style="list-style-type: none"> • The level of housing development will destroy the character of Appleton Thorn, Grappenhall, Stockton Heath and put excessive strain on important residential and local community services. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development

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	<p>proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities including Grappenhall village, Appleton Thorn and Stockton Heath.</p> <ul style="list-style-type: none"> • It should be noted that the updated PSVLP is no longer proposing to allocate the South West Urban extension or Port Warrington. In addition, the South East Warrington Urban Extension is significantly smaller than the previous Garden Suburb allocation. • The Council accepts that current infrastructure and services in south Warrington are not sufficient to support the level of development proposed. The South East Warrington Urban Extension is therefore dependent on a wide range of improvements to existing infrastructure and provision of new infrastructure.
<ul style="list-style-type: none"> • Where is evidence of sufficient affordable housing for people who will be employed in the proposed industrial estates in the area? If WBC calculate the number of jobs which the industrial areas will create, there is a shortfall. Langtree claim that their estate will create 4100 jobs and Stobart's 600 = a total of 4700. The target for houses in the Garden Suburb is 5000 so given that builders have to supply 30% of that total as 'affordable' then that figure is only 1500. Therefore around 3200 workers will have to commute into the area and so add to the traffic numbers. 	<ul style="list-style-type: none"> • The South East Warrington Employment Area will provide a range of jobs, but the Council acknowledges that the predominant uses will be warehousing and distribution and therefore there will be a relatively large number of lower skilled jobs. This emphasises the importance of providing a wide range of housing types across Warrington and in particular in the proposed South East Warrington Urban Extension, including provision of 30% affordable housing, to ensure that employees have the opportunity to live in close proximity to their work. The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • The Secretary of State for Housing, Communities and Local Government has confirmed the standard methodology is a starting point rather than a target. 	<ul style="list-style-type: none"> • The standard housing methodology defines the minimum housing requirement for a Council's area. The updated PSVLP is proposing to meet this requirement but is no longer proposing an additional uplift, based on revised estimates of jobs creation over the Plan Period.

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	<ul style="list-style-type: none"> The Council has demonstrated that the infrastructure required to support a housing target in line with the standard housing methodology is capable of being delivered and that areas of Green Belt can be released without compromising the overall function of Green Belt across the borough and the wider sub-region. It should be noted that all neighbouring boroughs have either released Green Belt in their adopted Plans or are currently preparing Plans which are proposing to do so. As such, in considering the Presumption in Favour of Sustainable Development, as set out in NPPF para 11, the Council does not consider there are any strong reasons for restricting the overall scale of development in the plan area.
<ul style="list-style-type: none"> Economic growth forecasts which drive the housing target are highly questionable. The Plan figure of 945 is based on a speculative and over ambitious (given the current economic climate and the ongoing uncertainty over Brexit) figure from Cheshire & Warrington's Local Enterprise Partnership's Strategic Economic Plan. Warrington is an extremely successful town with high levels of employment. Unlike in many other places, there is no need to generate a high level of new jobs. 	<ul style="list-style-type: none"> The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 – in line with the Government's Standard Housing Methodology - will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.
<ul style="list-style-type: none"> Increasing the housing target above the OAN to improve 'affordability' represents double counting, as this is already built into the standard housing methodology. 	<ul style="list-style-type: none"> The Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. The Council is no longer proposing an uplift to this figure.
<ul style="list-style-type: none"> The housing target "has been set to ensure that there are sufficient homes to meet the Council's economic growth aspirations" (page 33 of Local Plan). Thus, the housing number is not based on need but on the Council's desire for the town to become larger and valuable Green belt land is to be sacrificed to achieve this goal. 	<ul style="list-style-type: none"> In determining Warrington's housing requirement, the Council has followed the Government's Standard Housing Methodology and associated Planning Practice Guidance. The Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under

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	<p>the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan.</p> <ul style="list-style-type: none"> • The Council considers that setting the housing requirement of the Plan to the minimum requirement under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the previous proposed target.
<ul style="list-style-type: none"> • The Council should request special dispensation to the 2016-based household projections to determine the 'housing need target' rather than the outdated 2014 based projections. Such a move would allow the Council to protect local Green Belt land. 	<ul style="list-style-type: none"> • The Council has used the 2014 Based Household Projections to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance.
<ul style="list-style-type: none"> • Considerable local concern and confusion as to how the housing figures have been arrived at and how they can justify the scale of Green Belt release proposed 	<ul style="list-style-type: none"> • The process the Council went through is establishing the Local Plan's housing requirement is set out in detail in the Council's Local Housing Needs Assessment and summarised in Section 3 of the Plan and in the supporting text to Policy DEV1. The calculation that establishes the required amount of Green Belt release required is based on an assessment of the optimal capacity of non-Green Belt land in the borough compared to the overall housing requirement, taking into account the need to make provision for a degree of flexibility in the Plan's housing land supply. This calculation is set out in detail in the 'Development Options and Site Assessment Technical Report' published as evidence base to the Plan and summarised in Section 3 of the Plan and in the supporting text to Policy DEV1. • It should be noted that the Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. The Council has also updated its assessment of brownfield land and re-based

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	the Plan period to 2021 to 2038. These also have direction implications on the amount of Green Belt land the Council is proposing to release.
<ul style="list-style-type: none"> • Critical of the oversimplified approach to housing need in Warrington as part of the Standard Methodology - in terms of affordability, no recognition is given to the distortion of high value housing across south Warrington 	<ul style="list-style-type: none"> • The Council considers that it has established its housing requirement in accordance with Government planning policy and associated Planning Practice Guidance. Consideration of house prices across the borough has been taken into account in the preparation of the Local Housing Needs Assessment, but variation in houses prices within the borough does not directly contribute to the housing requirement calculation.
<ul style="list-style-type: none"> • The Borough's Housing Strategy 2018-2028 states that Warrington needs 586 houses per year up to 2037. The PSVLP sets an annual target of 945dpa with no convincing reason provided for this difference. 	<ul style="list-style-type: none"> • The Council's Housing Strategy identified the need for 4,000 new homes to 2022 and 9,000 new homes to 2027. It confirms that these targets are subject to the housing requirement to be established by the emerging Local Plan.
<ul style="list-style-type: none"> • Predicted population growth is high in Warrington compared to neighbouring boroughs - there would be a logic in a wider spread of population growth at a sub-regional and regional level. The approach taken by the Council is inwardly focused. The Council is challenged over whether sufficient discussions have taken place with neighbouring authorities about economic growth. 	<ul style="list-style-type: none"> • The Council has established its housing requirement working closely with neighbouring boroughs through the 'Duty to Cooperate'. This is evidenced in the Council's Statement of Common Ground.
<ul style="list-style-type: none"> • The ability of the Council to deliver the proposed level of housing is very much in doubt. Delivery rates have historically been lower than that proposed in the draft plan. Control over delivery rate will not be determined by the Council, developers will dictate the rate of completion. The laws of supply and demand dictate that if the market is flooded with houses, the builders will not be able to sell anywhere their optimum price and they will find ways to stall and disrupt the schedule. 	<ul style="list-style-type: none"> • The Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. The Council considers the revised housing requirement is ambitious but achievable. The Council acknowledges the recent relatively low level of housing completions. When considered over a 20 year period, Warrington's average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council's housing target was only 380 per annum up to 2014. The Council's

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	housing trajectory projects an increase in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will establish a housing land supply to support the Plan's housing requirement over the Plan period as a whole.
<ul style="list-style-type: none"> • The resulting logistical issues arising from the scale of house building is staggering. Residents will effectively be living in a colossal building site for the next 20 years. 	<ul style="list-style-type: none"> • Development will come forward on a phased basis across the Plan period. The draft Local Plan and approved SPDs contain specific measures to minimise disturbance to existing residents during the construction phase of development.
<ul style="list-style-type: none"> • Density figures used in the plan should be reviewed to minimise the requirement for Green Belt release. 	<ul style="list-style-type: none"> • Following previous Local Plan consultations the Council has reviewed its density assumptions for the Town Centre and Inner Warrington and is reviewing its residential parking standards, recognising the potential for high density development in these locations. The Council is proposing minimum density requirements for the Town Centre and other sites that are in highly sustainable locations, together with minimum requirements for all site allocations. As such, the Council considers that the Plan's residential densities will optimise the use of land in accordance with the requirements of the NPPF and will help to ensure the amount of Green Belt release required to support Warrington's development needs is minimised.
<ul style="list-style-type: none"> • The Government requirement is for a Local Plan to last 15 years. Given the uncertainty of forecasting this far ahead, it is considered there is no need for the Plan period to be 20 years. This would reduce the number of houses required and in particular the number to be built on the Green Belt. 	<ul style="list-style-type: none"> • The Plan period is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption. The Council has however re-based the updated Proposed Submission Version Local Plan with a start date of 2021. This results in a total Plan Period of 18 years.
<ul style="list-style-type: none"> • An optional 10% flexibility uplift has been included which is unnecessary because the Plan has to be reviewed every five years. The standard allowance is 5% but in the face of developer demands for a 20% buffer, the Council has arbitrarily increased housing figure 'flexibility' to 10%. 	<ul style="list-style-type: none"> • It is necessary to include provision for flexibility on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward. The Council has used a benchmark of 10% which it considers provides sufficient flexibility in the context of the Plan's proposed housing land supply. The flexibility benchmark equates to a

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	similar size to one of the Plan's large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.
<ul style="list-style-type: none"> • This statement regarding deliverability and its review within the first 5 years is wholly contrary to the NPPF guidelines. It is no use taking the Green Belt and then deciding 5 years later that it was not a warranted decision. 	<ul style="list-style-type: none"> • The NPPF requires Councils to review policies in local plans to assess whether they need updating at least once every five years, and should then be updated as necessary (para 33). Policy DEV1 provides additional detail in this respect and identifies that one of the key changes which may necessitate an update to the Plan is in the event that the Council can no longer demonstrate either a 5 year deliverable housing land supply or a sufficient developable supply over the Plan period as a whole.
<ul style="list-style-type: none"> • There are phasing requirements that could delay housing delivery and are reliant on substantial improvements to infrastructure. 	<ul style="list-style-type: none"> • The Plan is based on a detailed assessment of the Borough's existing infrastructure and the new and improved infrastructure required to support the proposed level of growth. The Plan has specific policy requirements to ensure that infrastructure improvements are coordinated with new development. This is also reflected in the Plan's stepped housing trajectory which proposes a lower level of development in the early years of the Plan to reflect the lead in times to deliver required infrastructure.
<ul style="list-style-type: none"> • Reducing the housing target to the OAN, reducing the flexibility factor to 5% and rebasing the Plan period to 15 years from 2019 would allow Green Belt boundaries to stay intact for the whole plan period, as indeed was envisaged by the previous Core Strategy. 	<ul style="list-style-type: none"> • The Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. • The Council has re-based the Plan to start from 2021 but in accordance to the NPPF the Plan must extend a minimum of 15 years following the date of adoption. The Plan period therefore extends to 2038 given that the Plan is likely to be adopted in 2023. • The Council has used a benchmark of 10% which it considers provides sufficient flexibility in the context of the Plan's proposed housing land supply. The flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.

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<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • A number developers support the delivery of 18,900 dwellings over the plan period as the minimum number of homes that the Council should be seeking to deliver. 	<ul style="list-style-type: none"> • Support Noted. • It should be noted however that the Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan.
<ul style="list-style-type: none"> • A number of developers consider that the uplift in the housing target to support planned levels of economic growth should be increased. There is a concern that the Council’s Local Housing Needs Assessment is aligned with a level of job growth that is well below what has been achieved in Warrington over recent years and which is inconsistent with the employment land target which will generate a level of job growth considerably in excess of the level that could be serviced by the increase in labour supply resulting from 945 dpa. Developers also consider the Local Housing Needs Assessment has applied unrealistic assumptions around unemployment and economic activity rates which are boosting job growth without a commensurate increase in housing need. 	<ul style="list-style-type: none"> • In determining Warrington’s housing requirement, the Council has followed the Government’s Standard Housing Methodology and associated Planning Practice Guidance. The Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. • The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council’s economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period. • The Council is confident that setting the housing requirement of the Plan to the minimum requirement under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the previous proposed target.

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<ul style="list-style-type: none">• Some developers raised the concern that affordable housing need will not be met as the Council has not applied an uplift to its overall housing target to meet increased affordable housing need, as expected by the NPPF.	<ul style="list-style-type: none">• The Council has considered whether it should increase its housing target in order to increase the supply of affordable housing in accordance with the Government’s Planning Practice Guidance.• It is considered totally unreasonable for the Council to deliver the full affordable housing requirement through its affordable housing policy applied to eligible market housing led developments. This would require the housing target to more than double and from the SA/SEA process and previous consultations it is apparent that this would result in unacceptable environmental harm and would be unrealistic in terms of delivery. The Council has considered whether it should apply a smaller uplift to the headline housing target. However in reviewing the Plan’s housing requirement, the Council has concerns about the realism of sustaining a higher level of housing growth over the Plan period and the additional Green Belt land which would need to be released. Further, a higher housing target could result in issues of market saturation and / or result in a higher level of out-commuting given the increase in working age population would be proportional higher to the number of jobs forecast to be created over the Plan period.• The PPG recognises that the need for particular groups, including those in need of affordable housing, may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method. From the LHNA it can be seen that a large proportion of the net affordable requirement is from existing households. Further, it is apparent that the increase in affordable housing need over time is primarily due to the reduction in re-lets from available properties, rather than an increase in gross affordable need.

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Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Council notes that the Government's standard method already includes an uplift above basic demographic need to address issues of affordability. By providing a flexibility in land supply which equates to 13.5%, and a longer term supply of homes beyond the Plan Period, there is also the potential for further delivery should the housing market be able to deliver at a higher rate. There are also other sources of affordable housing supply, including developments by Registered Providers and the Council's Housing Company which are likely to deliver a much higher proportion of affordable housing. • The Council is therefore not proposing a further uplift to its proposed housing target of 816.
<ul style="list-style-type: none"> • A number of developers consider that the flexibility factor should be increased to 20%. This is due to what are considered to be the risks associated with the delivery of the large strategic sites and the reliance on higher density development in the town centre and Waterfront where the Council is reliant on the emergence and growth of a new residential market from a relatively low base position. 	<ul style="list-style-type: none"> • It is necessary to include provision for flexibility on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward. The Council has used a benchmark of 10% which it considers provides sufficient flexibility in the context of the Plan's proposed housing land supply. The flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.
<ul style="list-style-type: none"> • A number of developers consider that the Plan is based upon unduly optimistic assumptions about the delivery of a substantial number of homes on brownfield sites within and to the edge of Warrington, and other urban locations, as set out through the SHLAA and the Council's town centre masterplanning work. 	<ul style="list-style-type: none"> • The NPPF requires the Council to make as much use as possible of suitable brownfield sites and underutilised land (para 137.a). To ensure it meets this requirement, the Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its brownfield register, both of which are updated on an annual basis. The Council has also undertaken additional masterplanning work in the town centre and surrounding area to identify additional brownfield capacity. This masterplanning work has been incorporated into the SHLAA, enabling each site to be assessed in terms of availability and deliverability. The Council is therefore confident

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	that the brownfield component of the Plan's housing and employment land supply is capable of being delivered.
<ul style="list-style-type: none"> • There are concerns around a number of assumptions in the SHLAA - in respect of build rates, density, net site area and lead in times - which are considered too ambitious. Developers also do not believe there is sufficient evidence in the SHLAA that sites in the 5 year land supply without planning permission meet the more rigorous deliverability criteria set out in Annex 2 of the revised NPPF. 	<ul style="list-style-type: none"> • The SHLAA and master planning work that the Council have undertaken was updated following the PDO consultation and the previous Proposed Submission Version Local Plan consultation, taking into account relevant representations. The capacities and build rates of the large sites are in the majority of cases informed by information provided by the developers of the sites in the first instance and only if it is not possible to obtain any details are the standard assumptions applied. The assumptions in the SHLAA (Build Rates; Lead-in-times; Densities etc) are based on local evidence and are re-appraised annually to ensure that they up-to-date and take account of recent fluctuations in market conditions. In updating the SHLAA the Council has also ensured that all sites included in its 5 year land supply meet the deliverability criteria set out in Annex 2 of the NPPF.
<ul style="list-style-type: none"> • The majority of developers are suggesting that additional land will need to be released to address their concerns over what is considered to be an under estimate of housing need, an over reliance on urban capacity and a requirement for a greater flexibility factor. 	<ul style="list-style-type: none"> • If the Council was to increase the Plan's housing requirement, increase the flexibility factor and reduce reliance on urban capacity, then there is a risk that the housing requirement may not be deliverable, that the Council would not be able to demonstrate that it has optimised the capacity of the existing urban area and that excessive Green Belt land would be released.
<ul style="list-style-type: none"> • A number of developers do not agree with the proposed stepped housing trajectory and argue that more medium sized sites should be allocated to bring more housing forward earlier in the plan period. Historic under delivery and 5 year housing land supply shortfall are given as further reasons for releasing additional sites for allocation or to identify 'reserve sites', to be brought forward in the Plan period in the event of non-delivery of committed sites and any other shortcomings in housing land supply. 	<ul style="list-style-type: none"> • The Plan proposes a stepped trajectory as it is recognised that the Main Development Areas will have relatively long lead in times. This is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The Spatial Strategy already ensures additional small and medium sizes sites will come forward from the proposed Green Belt release in the outlying settlements early in the Plan Period in addition to the continued provision from existing sources in the wider urban area. The Council recognises a degree of risk associated with a large proportion of development being proposed within the 4 Main Development Areas.

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	<p>This is reflected in the benchmark flexibility factor in the land supply of 10%.- roughly equivalent to the size of one of the large allocation sites– and the inclusion in the Plan of a review mechanism should housing land supply not be delivered in accordance with the planned trajectory. As such the Council does not considered there is any need to identify ‘reserve’ sites.</p> <ul style="list-style-type: none"> • The updated PSVLP also includes an additional site at Thelwell Heys which will deliver additional homes early in the Plan Period, complementing the larger development sites without having a material impact on the functioning of Warrington’s Green Belt.
<ul style="list-style-type: none"> • Developers promoting sites in the outlying settlements believe that the Plan does not properly consider the growth potential of the settlements and that they can accommodate further site allocations. 	<ul style="list-style-type: none"> • The Council considers that it has given detailed consideration to the growth potential of the outlying settlements through the options assessment process. The level of development proposed in the outlying settlements is considered to be appropriate in the context of the Plan’s overall spatial strategy. The level of development can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements and will not change the character of the respective settlements. Further allocations in the outlying settlements are not considered necessary to meet the Plan’s housing requirement and could have infrastructure and character impacts.
<ul style="list-style-type: none"> • A number of developers are concerned that sufficient flexibility has not been allowed for to ensure that Green Belt boundaries can endure beyond the current plan period. There is criticism of the Council’s approach to consideration of housing need beyond the Plan Period, which is considered to: underestimate future housing need; incorrectly offset the flexibility factor against future need; and is overly optimistic about future brownfield capacity. There is also criticism that the Council has not identified areas of safeguarded land. 	<ul style="list-style-type: none"> • In providing a positive plan for growth, the Council considers that by the end of the Plan period, house price affordability will no longer be a significant issue in Warrington and therefore any uplift beyond the household projections will be minimal. The Council also notes that the rate of increase in households is projected to decrease over the last 10 year period of the Plan. Given the rate of job growth is also forecast to decrease over time, the Council considers there will not be a requirement for any uplift in housing numbers to provide a balance with future jobs growth. In terms of land supply, the Local Plan is already providing for around 2,000 additional homes through the flexibility factor in its land

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	<p>requirement calculation. The proposed South East Warrington Urban Extension allocation in the draft Local Plan will provide for around 1,800 homes beyond the Plan period and Fiddlers Ferry will provide around 450 homes. The Council acknowledges that the availability of brownfield development sites is likely to decrease over time. Nevertheless, given likely advances in technology and development trends over the next 20 years, the Council considers it is likely there will be additional major brownfield development sites that will come forward beyond the Plan Period but cannot be accounted for at present. The Council therefore considers that there will be sufficient supply to meet the level of housing need for at least 12 years following the end of the Plan period. The Council is therefore confident that there is no need for any safeguarding of land to meet future residential need and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period.</p>
Statutory Consultees	
<ul style="list-style-type: none"> St Helens Council supports the housing needs and delivery figures set out in Policy DEV1 and the other provisions set out within this policy. As St Helens, Warrington and Halton form a single 'housing market area' this policy is of particular interest. The housing need and delivery figures are justified in the Plan and its evidence base. The approach set out is also consistent with the extensive discussions that officers from the two Councils have undertaken as part of the 'duty to co-operate'. 	<ul style="list-style-type: none"> Support noted. It should be noted however that the Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan.
<ul style="list-style-type: none"> Cheshire East Council considers that the Government's standard housing need formula requires that the current year (not the initial Plan year) be used as the base year for household change, and the housing need should be based on the latest available housing affordability ratio for the latest available year. This results in an indicative housing need for WBC of 859pa (not the 909pa). However, given that national planning policy allows councils to plan for higher levels of housing provision if that is 	<ul style="list-style-type: none"> The Council acknowledges that the standard method calculation should be based on the current year. This has been addressed in the updated Local Housing Needs Assessment, and results in a minimum housing need figure of 816 homes per annum, using 2021 as the current year. The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the

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<p>required to achieve their economic growth aspirations – and given our view that the rate of jobs growth that the Proposed Submission Version Local Plan plans for is realistic – Cheshire East still consider that Warrington’s proposed provision of 945 net new dwellings per annum is reasonable. It will be important to ensure that this higher number can be fully delivered within the Plan period.</p>	<p>Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 – in line with the minimum housing need figure under the standard method - will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.</p>
<ul style="list-style-type: none"> • Sport England considers that sites identified for development should be consistent with our Playing Fields Policy. This is especially important where Sport England would be a statutory consultee on developments that would prejudice the use of playing fields as defined by Article 16(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010 in that it is on land that has been used as a playing field within the last five years and the field encompasses at least one playing pitch of 0.2ha or more, or that it is on land that allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement. 	<ul style="list-style-type: none"> • The Council considers that the Plan’s open space policies will ensure Sport England’s requirements are met.
<p>Other</p>	
<ul style="list-style-type: none"> • The Homes Builders Federation (HBF) support the Council’s decision to utilise a housing figure over and above that set out in the MHCLG Standard Methodology, which is considered appropriate to support growth in Warrington. The plan could facilitate higher levels of growth by providing greater flexibility. The HBF do not consider the stepped trajectory to be justified and would recommend that further sites should be allocated for delivery in the first five years of the plan. The HBF has some concerns over the deliverability of some of the supply of sites from the urban area particularly where these sites are occupied by alternative uses and / or contingent on ambitious infrastructure investment. HBF support the inclusion of a buffer to provide flexibility, albeit it the HBF 	<ul style="list-style-type: none"> • It should be noted however that the Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. • The Plan proposes a stepped trajectory as it is recognised that the Main Development Areas will have relatively long lead in times. This is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The Spatial Strategy already ensures additional small and medium sizes sites will come forward from the proposed Green Belt release in the outlying settlements early in the Plan Period in addition to the continued provision from existing sources in the wider urban area.

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<p>would normally recommend a 20% buffer. Concerned that the Council no longer appear to be including any safeguarded land within their Plan.</p>	<p>The Council recognises a degree of risk associated with a large proportion of development being proposed within the 4 Main Development Areas. This is reflected in the benchmark flexibility factor in the land supply of 10% - roughly equivalent to the size of one of the large allocation sites– and the inclusion in the Plan of a review mechanism should housing land supply not be delivered in accordance with the planned trajectory. As such the Council does not considered there is any need to identify any further sites.</p> <ul style="list-style-type: none"> • The updated PSVLP also includes an additional site at Thelwell Heys which will deliver additional homes early in the Plan Period, complementing the larger development sites without having a material impact on the functioning of Warrington’s Green Belt. • The Council considers that there will be sufficient land supply to meet the level of housing need for at least 12 years following the end of the Plan period. The Council is therefore confident that there is no need for any safeguarding of land and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period.
<ul style="list-style-type: none"> • CPRE consider the assumption that more houses built will reduce house prices is based is a false premise. Government dictating use of 2014, which is out of date data is considered poor practice and this will cause the loss of significant amounts of countryside. CPRE believe Warrington Council should stand up for its residents, and challenge the Government’s ‘standard method’ and use the up to date 2016 based growth figures. CPRE believe brownfield land should be brought forward as a priority and not left wasted, as allocating greenfield land for development will impact on the viability of reusing brownfield sites. 18,900 new homes is considered excessive and based on inflated growth projections. The yearly target of 945 dwellings is considered too high for the Council to reasonably deliver, evidenced by the fact Policy DEV1 has a 	<ul style="list-style-type: none"> • It should be noted that the Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. • The Council has used the 2014 Based Household Projections to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance. The Council believes the Plan will optimise brownfield development and has a housing requirement which is ambitious but achievable; will ensure that issues of affordability are addressed; and will support the number of jobs that will be created over the Plan period. The Council has used a benchmark flexibility factor of 10% which it considers provides sufficient

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Summary of Issues Raised	Response
<p>stepped housing delivery trajectory. CPRE think more modest buffer of 5% should be added rather than 10%.</p>	<p>flexibility in the context of the Plan's proposed housing land supply. The flexibility is roughly equivalent to the size of one of the large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.</p>
<ul style="list-style-type: none"> Warrington & Halton Green Party consider that there is excessive Green Belt release due to the Plan period being longer than required; the economic forecasts the housing target is based on being unrealistic; the use of the 2014 rather than more recent 2016 household projections; and the application of a 10% flexibility factor for which there is no need. There is also a concern that the housing target is not deliverable when compared to recent levels of completions. 	<ul style="list-style-type: none"> The Plan period is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption. The Council has however re-based the updated Proposed Submission Version Local Plan with a start date of 2021. This results in a total Plan Period of 18 years. It should be noted that the Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. The Council has used the 2014 Based Household Projections to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance. The Council considers the Plan has a housing requirement which is ambitious but achievable; will ensure that issues of affordability are addressed; and will support the number of jobs that will be created over the Plan period. It is necessary to include provision for flexibility on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward. The Council has used a benchmark of 10% which it considers provides sufficient flexibility in the context of the Plan's proposed housing land supply.
<ul style="list-style-type: none"> Residents from neighbouring boroughs raise similar concerns to the Council's housing target as those expressed by Warrington residents. The Housing target is considered to be excessive, based on overly optimistic economic forecasts, based on outdated demographic data and is 	<ul style="list-style-type: none"> It should be noted that the Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan.

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significantly above the number of homes that Warrington has delivered over recent years.	<ul style="list-style-type: none"> • The Council has used the 2014 Based Household Projections to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance. The Council considers the Plan has a housing requirement which is ambitious but achievable; will ensure that issues of affordability are addressed; and will support the number of jobs that will be created over the Plan period.

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The allocation of housing sites in the south of the borough will not provide for affordable housing to buy and current 'affordable' housing is not affordable. More social housing and housing for the vulnerable is required and this will not be provided by land release in the south of the borough 	<ul style="list-style-type: none"> New development in south Warrington will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council's housing waiting list. A third will be for low cost home ownership, of which the majority will be 'First Homes' specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers.
<ul style="list-style-type: none"> The proposals do not meet recommendation set out in the Local Housing Needs Assessment (LHNA) for accessible and adaptable dwellings and for additional care home places. 	<ul style="list-style-type: none"> The Council has updated its LHNA and the associated policy requirements for accessibility standards. The updated Proposed Submission Version Local Plan is now seeking all homes to meet standard M4(2) (accessible and adaptable dwellings) with 10% required to meet standard M4(3) (wheelchair user dwellings). This is subject to viability and technical feasibility considerations. The Updated PSVLP is clear that The Council will support applications for Supported and Extra Care housing in accessible locations, subject to other relevant policies in the Plan. Specific provision for care homes is also made in the specific Main Development Area allocations. It should be noted however that the Council's broader strategy is to seek to ensure people are able to stay in their own homes wherever possible. In this context the Council's approach to accessibility standards will also help meet the needs on the large increase of older people over the Plan Period.
<ul style="list-style-type: none"> More affordable homes need to be provided on brownfield sites in the town centre where demand is higher. 	<ul style="list-style-type: none"> The demand for affordable homes is based on analysis of 'need' across the borough as a whole and the Council is seeking to widen the supply of affordable housing in all areas of Warrington. The updated LHNA (2021) does give consideration to the mix of dwellings in different parts of the

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
	<p>borough, with the opportunity for higher density development on brownfield sites in the town centre and inner Warrington area.</p> <ul style="list-style-type: none"> • The lower affordable housing requirement on brownfield sites in the town centre and inner Warrington is based on the viability. Brownfield sites normally have higher development costs due to remediation needs and building costs than outer suburban sites or green field sites. To ensure inner urban sites remain viable a lower proportion of affordable is considered necessary.
<ul style="list-style-type: none"> • Developers will not provide affordable housing as they will argue viability particularly where there are significant infrastructure requirements 	<ul style="list-style-type: none"> • The NPPF and associated Planning Practice Guidance require viability to be considered and tested at the plan making stage. To support its approach the Council has updated its Local Plan Viability Assessment and assessed the Plan's affordable housing policy and site allocations, taking into account infrastructure requirements. The Council is therefore confident that it will secure affordable housing in line with its planning policy requirements. There may however be instances where site specific reasons provide genuine viability challenges and as such the Council may need to consider a lower level of affordable housing provision.
<ul style="list-style-type: none"> • Smaller properties required, plenty of affordable properties for different age groups and larger 3-5 bed properties available. 	<ul style="list-style-type: none"> • The Council has updated its LHNA which gives specific consideration to the need for different sizes of properties across different tenures and in across different sub areas of the borough. The LHNA (2021) will be used in considering the housing mix coming forward on individual development sites.
<ul style="list-style-type: none"> • Priority is for starter homes for first time buyers. 	<ul style="list-style-type: none"> • In accordance with the NPPF, the Updated PSVLP (2021) includes a specific requirement for 25% of affordable homes secured through market led development schemes to be 'First Homes' for first time buyers.
<ul style="list-style-type: none"> • The proposals do not meet location needs for more home ownership in Lymm, rental percentage is too high and decisions on affordable tenure should be delegated to the Neighbourhood Plan. 	<ul style="list-style-type: none"> • The need for affordable homes is based on analysis of 'need' across the borough as a whole and the Council is seeking to widen the supply of affordable housing in all areas of Warrington. The updated LHNA has confirmed that the majority of need in Warrington is for affordable home

Policy DEV2 - Meeting Warrington's Housing Needs	
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	for rent. Nevertheless, the Council will still seek a third of homes in Lymm to be provided for low cost home ownership. There is the opportunity for further detail on housing mix to be provided in the Lymm Neighbourhood Plan, but it is required to be in general conformity with Warrington's Local Plan.
<ul style="list-style-type: none"> The demographic calculations are not correct and are based on out of date figures and incorrect assumptions for economic growth. 	<ul style="list-style-type: none"> In determining Warrington's housing requirement, the Council has followed the Government's Standard Housing Methodology and associated Planning Practice Guidance, which requires the Council to use the ONS 2014 Household Projections as the starting point for calculating housing need. The Updated Proposed Submission Version Local Plan proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.
<ul style="list-style-type: none"> The policy is not workable because it will not stop landlords buying affordable properties and then renting them out. 	<ul style="list-style-type: none"> The policy at point 11 requires that Affordable Housing is provided to eligible households and individuals for the specific tenure in accordance with the Council's nomination policy. The Policy seeks to require that affordable housing is secured in perpetuity.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> Concerns that housebuilders will not deliver affordable housing by arguing it is unviable. 	<ul style="list-style-type: none"> The NPPF and associated Planning Practice Guidance require viability to be considered and tested at the plan making stage. To support its

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
	<p>approach the Council has updated its Local Plan Viability Assessment and assessed the Plan's affordable housing policy and site allocations, taking into account infrastructure requirements. The Council is therefore confident that it will secure affordable housing in line with its planning policy requirements. There may however be instances where site specific reasons provide genuine viability challenges and as such the Council may need to consider a lower level of affordable housing provision.</p>
<ul style="list-style-type: none"> • Affordability should be based on income rather than percentage of the market price. 	<ul style="list-style-type: none"> • The Council has assessed the need for affordable housing in accordance with the requirement of the NPPF and associated Planning Practice Guidance. In the updated LHNA (2021), income is taken into consideration in establishing the need for different affordable tenures. This is then reflected in the requirements of Policy DEV2 to secure affordable housing and ensure its affordability to those in need.
<ul style="list-style-type: none"> • Do not consider that 20% and 30% for inner and outer areas for affordable housing is suitable 	<ul style="list-style-type: none"> • The lower affordable housing requirement on brownfield sites in the town centre and inner Warrington is based on the viability. Brownfield sites normally have higher development costs due to remediation needs and building costs than outer suburban sites or green field sites. To ensure inner urban sites remain viable a lower proportion of affordable is considered necessary.
<ul style="list-style-type: none"> • Welcome the provision for wheel chair provision but would like to see single storey/bungalow properties specified in the policy. 	<ul style="list-style-type: none"> • Support noted. • The Council has not made explicit reference to the requirements of single storey properties or bungalows in the policy. Although these would assist in meeting the requirement for accessible homes, they may not be possible to deliver on every site, particularly where the Council is seeking to support higher density development.
Landowner/Developer and the HBF	
<ul style="list-style-type: none"> • General support for the provision of affordable and specialist housing across the borough. 	<ul style="list-style-type: none"> • Support noted • It should be noted that Policy DEV2 has been updated to reflect the evidence in the latest LHNA (2021).

Policy DEV2 - Meeting Warrington's Housing Needs	
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<ul style="list-style-type: none"> • Support for the mix of property required on site. However concerns that this should be less restrictive with regard to location and take account of site viability and changes in need and demand over the plan period. 	<ul style="list-style-type: none"> • DEV2 provides a borough wide monitoring target for the overall mix of different sized dwellings, but ensures there is flexibility on the specific mix of individual development sites to reflect location and site characteristics. Further detail is provided in the latest LHNA on housing mix at the sub borough level. • The Council will ensure its housing mix policies are kept under review through the Plan Period.
<ul style="list-style-type: none"> • Issues raised with regard to specific percentage site targets set on provision for older persons and for 'Accessible and Adaptable dwellings' and associated targets related to wheel chair accessible dwellings. 	<ul style="list-style-type: none"> • The Council has updated its LHNA and the associated policy requirements for accessibility standards, in accordance with the requirements of the NPPF and associated Planning Practice Guidance. The updated Proposed Submission Version Local Plan is now seeking all homes to meet standard M4(2) (accessible and adaptable dwellings) with 10% required to meet standard M4(3) (wheelchair user dwellings). This is subject to viability and technical feasibility considerations. The Council has ensured that the costs of meeting these standards have been accounted for in the updated Local Plan Viability Assessment. • The Updated Proposed Submission Version Local Plan requires all major housing sites to provide housing for older people but has removed the previous 25% target.
<ul style="list-style-type: none"> • Concerns that the wording is not in line with NPPF and that the policy should be amended at: <ul style="list-style-type: none"> ○ That the affordable home requirement should be not 'equivalent' to 10% but should be a 'minimum' or 'at least' ○ 10% affordable for purchase restricts the ability to supply affordable by other sectors. ○ That policy is incorrect in asking for all affordable homes (rather than just rural provision) to be affordable in perpetuity. 	<ul style="list-style-type: none"> • The Council considers the updated PSVLP is fully considered with the latest NPPF (2021). Additional criteria have been introduced to ensure the Council meets the NPPF requirement for the provision of 'First Homes'. • The Policy seeks to ensure affordable housing is secured in perpetuity, however, 'staircasing' – the process which allows occupiers to own a greater proportion of their home - will be supported where the value from the sale is re-invested in affordable housing in Warrington.
<ul style="list-style-type: none"> • Clarification is sought on criteria 2 of Policy DEV2 and the related supporting text in paragraph 4.1.34. Criteria 2 of the policy suggests that Affordable Home Ownership should be equivalent to 10% of the total 	<ul style="list-style-type: none"> • The revisions to Policy DEV2 in the updated PSVLP (2021) ensure the Council's tenure split requirements for affordable housing, including the

Policy DEV2 - Meeting Warrington's Housing Needs	
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<p>number of homes within a development and the remainder should be affordable or social rent. (i.e. 90:10 Split in favour of rented products) However, the supporting text, in paragraph 4.1.43 suggests 66:34 split in favour of rented products.</p>	<p>provision of homes for low cost homes ownership, are clear and are in accordance with the NPPF.</p>
<ul style="list-style-type: none"> • A proposal that wording is changed in the policy to reflect the aims of the NPPF and the aspirations of local people to meet their own housing needs: 'A different proportion and/or tenure split will be permitted where it can clearly be demonstrated to the satisfaction of the Council that development would otherwise not be financially viable or the proposal would better meet local housing needs.' 	<ul style="list-style-type: none"> • The Council considers that the proposed revision to the policy wording would undermine the ability of the Council to ensure that affordable housing is provided to meet the needs identified in the latest LHNA. • Additional wording has however been included in Policy DEV2 in the updated PSVLP to clarify that the Council will consider a different tenure split where there is clear evidence from a Registered Provider that an alternative tenure composition is required to ensure a development is deliverable.
<ul style="list-style-type: none"> • A representation that the second element of Part 6 of Policy DEV2 that states "will seek to ensure that the affordable housing is secured in perpetuity", is not appropriate in the context of the NPPF definition of affordable housing which sets clear guidelines on which tenures are to be retained in perpetuity and in which circumstances. This particularly applies to affordable housing delivered on rural exception sites (noting that this is not applied to entry-level exception sites), but does not extend to the general provision of affordable housing. It is recommended that this part of the policy, together with paragraph 4.1.37, is removed as it is not consistent with national policy and potentially damaging to the delivery and long term supply of affordable housing. A recommendation is made that the policy wording is amended at the end of the sentence '... is secured in perpetuity', to add or a 'staircasing' arrangement is secured to recycle affordable housing contribution." 	<ul style="list-style-type: none"> • The Policy seeks to ensure affordable housing is secured in perpetuity. The supporting text already clarifies that 'staircasing' – the process which allows occupiers to own a greater proportion of their home - will be supported where the value from the sale is re-invested in affordable housing in Warrington.
Statutory Consultees	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Other	

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Support for policy to support plots for self-build but concerns that there is no proper assessment of need. 	<ul style="list-style-type: none"> • The Council considers that it has a full understanding of the need for self-build plots through its self-build register.
<ul style="list-style-type: none"> • More affordable housing over and above 30% with greater mix of housing in rural villages for different types of households. 	<ul style="list-style-type: none"> • The Council has set its affordable housing target having taken into account the updated LHNA (2021) and the updated Local Plan Viability Assessment (2021). • The Council is seeking a broad mix of homes across the borough. The policy provides a borough wide monitoring target for the overall mix of different sized dwellings, but ensures there is flexibility on the specific mix of individual development sites to reflect location and site characteristics. Further detail is provided in the latest LHNA on housing mix at the sub borough level. There is also the opportunity for neighbourhood plans to provide more detailed requirements on housing mix.
<ul style="list-style-type: none"> • Timescale are too long and the plan should only be for 15 years to accommodate change over the period of the plan. 	<ul style="list-style-type: none"> • The Plan period is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption. The Council has however re-based the updated Proposed Submission Version Local Plan with a start date of 2021. This results in a total Plan Period of 18 years.

Policy DEV3 - Gypsy & Traveller and Travelling Showpeople Provision	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The illustrative plan for Policy MD2 showing the Garden Suburb does not identify the proposed location of a Travellers/Gypsy facility, even though it is specifically mentioned in both Policies DEV3 (Part 3) and MD2 (Part 5(i)). It is essential that WBC clearly indicate the proposed location of any sites. 	<ul style="list-style-type: none"> • Since the policies were drafted a site containing 6 pitches has been granted planning consent (2019/34576). The policies have been amended in the updated PSVLP to reflect this and remove the requirement for any further specific allocations in south Warrington.
<ul style="list-style-type: none"> • Traveller sites should be located: <ul style="list-style-type: none"> ○ away from residential areas; ○ on brownfield sites to avoid disturbance to local residents; and ○ incorporate green buffers around the boundaries. • Green Belt and farmland should not be released when brownfield land is available (e.g. empty warehouse space around Birchwood or on the Omega site). 	<ul style="list-style-type: none"> • Policy DEV3 sets out the criteria against which any proposals for new sites will be assessed. • Any proposals for new sites in the Green Belt will need to satisfy the requirements of Policy GB1 in addition to Policy DEV3.
<ul style="list-style-type: none"> • South Warrington already contains too many Traveller sites. Any sites should be located in North Warrington so they are evenly distributed. 	<ul style="list-style-type: none"> • There is actually a fairly even distribution of sites between the north and the south of the borough.
<ul style="list-style-type: none"> • A site is required for travellers in transit as a priority. To balance the sites evenly around Warrington this should be in the north east. A transit encampment for the travelling gypsy community should not be provided within the Garden Suburb. 	<ul style="list-style-type: none"> • Policy DEV3 identifies the need for a Transit Site and the criteria that will need to be satisfied for any new sites, including a transite site.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • A local cllr and Parish Council consider that there is no evidence that an additional eight pitches should be provided in the Garden Suburb or that WBC have sought the views of the Gypsy & Traveller Community as to where they would like a pitch or if other locations in the town are viable. The fact that a site is being promoted does not mean it is in the right geographical location. The majority of unauthorised encampments in Warrington occur in the north of the town (ie. Winwick, Rixton & Woolston, Culcheth, Croft & Glazebury). These will continue unless there is a greater geographical spread. 	<ul style="list-style-type: none"> • The Council's Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA, 2018) provides evidence of the need for new Gypsy and Traveller pitches and Travelling Showpeople plots for the 15-year period from 2017 up to 2032 as required by national policy. The GTAA identified a need for 15 further permanent Gypsy and Traveller pitches between 2017 and 2032 in addition to those consented at the time of the report being finalised (1st April 2018). • There was a site being promoted that was considered to be suitable, available and achievable and would meet the Council's requirement for providing a supply of deliverable site(s) sufficient to provide at least 5

Policy DEV3 - Gypsy & Traveller and Travelling Showpeople Provision	
Summary of Issues Raised	Response
	years worth of supply, which has now been granted planning consent (2019/34576). Hence, there is currently no need to allocate any more sites.
<ul style="list-style-type: none"> Any further permanent provision should to be located away from the main residential areas and with discrete green buffered boundary treatment. 	<ul style="list-style-type: none"> Policy DEV3 sets out the criteria against which any proposals for new sites will be assessed.
Landowner/Developer	
<ul style="list-style-type: none"> There is general support for the Policy from Wallace Land Investments in respect of the requirement to provide a permanent Gypsy & Traveller site in the Garden Suburb allocation. However, there needs to be careful consideration of its location providing good access to key services such as schools and health care. 	<ul style="list-style-type: none"> Support noted.
Statutory Consultees	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Other (1): (Travelling Showpeople)	
<ul style="list-style-type: none"> General support for the policy and objectives. In particular support for the identified need for a minimum of 15 permanent plots for Travelling Showpeople. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> Objection to the wording of policy DEV3. Occupiers of the site on land north of Hall Lane, Stretton require more individual/specific needs which cannot wait a further review of the Plan in five years time. Whilst such an approach is appropriate for housing provision for the settled population (where such needs are broadly generic), the needs identified for some of the Travelling Showpeople are more individual/specific – and in some circumstances more pressing. 	<ul style="list-style-type: none"> The site is located in the Green Belt and benefits from a current planning consent. The Local Plan process is not considered to be the correct process for accessing any extension to the site or intensification of its use. This should be accessed through a planning application.
<ul style="list-style-type: none"> The supporting text should be amended to reflect the most up-to-date position it terms of supply. 	<ul style="list-style-type: none"> The policy wording and the supporting text in the updated PSVLP reflect the most up-to-date position in terms of the supply and the level of need.
<ul style="list-style-type: none"> South Warrington already has a large number of privately-owned permanent Gypsy & Traveller and Travelling Showpeople sites, some of 	<ul style="list-style-type: none"> Policy DEV3 sets out the criteria against which any proposals for new sites will be assessed.

Policy DEV3 - Gypsy & Traveller and Travelling Showpeople Provision

Summary of Issues Raised

Response

these are within the village of Stretton. WBC should not permit any further applications for such sites within Stretton.

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Fiddlers Ferry Power Station is to close and will free up a large Brownfield site for employment development, within the Plan period, therefore reducing the need for Green Belt release to meet economic needs. Fiddlers Ferry should therefore be allocated as an employment site. 	<ul style="list-style-type: none"> • The updated PSVLP (2021) now proposes to allocate the Fiddlers Ferry Power Station Site for employment uses with all the land coming forward within the Plan Period.
<ul style="list-style-type: none"> • Too much emphasis on the Logistics and distribution sector that generate low levels of jobs, that are generally in turn low paid and low skilled, and becoming increasingly automated, whilst taking up a huge amount of land. 	<ul style="list-style-type: none"> • Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the town centre and inner Warrington. Through the update of the EDNA (2021), the Council has, however, revised down its estimate of future jobs growth.
<ul style="list-style-type: none"> • Large amount of vacant commercial property already available in the town to meet employment needs. 	<ul style="list-style-type: none"> • Through the Council's EDNA (2021) the local market is assessed through a quantitative review of property enquiries, deals done and the local supply of vacant premises alongside up to date market intelligence derived from consultations with a range of developers, scheme managers and property agents.
<ul style="list-style-type: none"> • Location of employment land, especially land in the Garden Suburb, does not support the aspirations of LTP4 which seeks to encourage the use of intermodal transport. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the updated PSVLP (2021) through the Warrington Multi-Modal Transport Model. A series of key transport infrastructure improvements are therefore required to support the proposed development allocations and the Plan as a whole, which may include multimodal transport options.
<ul style="list-style-type: none"> • Although the Plan aims to regenerate the town centre, much of the proposed employment is centred on warehousing/distribution and will not benefit the town centre in favour of sites on the edge of the Borough. 	<ul style="list-style-type: none"> • Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the Town Centre and inner Warrington.
<ul style="list-style-type: none"> • The Draft Plan Green Belt sites in south Warrington are already coming forward for development (Stobarts and Six56) when there are significant brownfield sites to develop. 	<ul style="list-style-type: none"> • National policy does not require all brownfield sites to be developed before Green Belt is released for development, where exceptional circumstances have been demonstrated to release Green Belt. The sites are also being promoted for development through the Planning application process, ahead of the PSVLP (2021). The applicant therefore

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
	has a need to demonstrate 'very special circumstances' through the planning application process to warrant the granting of planning permission.
<ul style="list-style-type: none"> The economic growth predictions are based on ambitious assumptions and are outdated. For example, the past take up rates over a 22 year period include development at Omega and these are not realistic going forward, and what about the implications of Brexit? 	<ul style="list-style-type: none"> The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2021) using data which post-dates the EU Brexit referendum. The Council no longer considers the previous scale of jobs growth to be realistic. However, the Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations.
<ul style="list-style-type: none"> Inflated job numbers will not be delivered, as evidenced by the Omega development, yet are used to drive a high and inflated housing target. 	<ul style="list-style-type: none"> In line with national policy, The Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data. The economic forecast data used to inform the PSVLP 2021 post-dates the EU Referendum decision. Through the update of the Council's EDNA (2021), the Council has revised down its estimate of future jobs growth and is confident that a reduced housing target of 816 – in line with the Government's Standard Housing Methodology in the updated PSVLP 2021, is sufficient to support the number of jobs anticipated to be created.
<ul style="list-style-type: none"> The types of jobs being promoted in the Logistics and Distribution sector will be filled from people travelling from outside of the Borough as the house prices in Warrington (especially the Garden Suburb), will not be affordable to low paid workers. 	<ul style="list-style-type: none"> The Council considers that the Plan's housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the Borough. The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling.
<ul style="list-style-type: none"> The amount of B8 development proposed in the south east in one location will cause large amounts of traffic congestion and air pollution due to the amount of HGV movements. 	<ul style="list-style-type: none"> The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
	measures and infrastructure improvements will be required to support the proposed levels of development.
<ul style="list-style-type: none"> • DEV4 is not a meaningful and robust economic strategy for the Town, and does not offer any justification for the large scale logistics and distribution employment expansion. We need a diverse array of jobs across the employment spectrum. 	<ul style="list-style-type: none"> • Warrington is home to a wide range of businesses. These range from major national and multi-national companies who have located their logistics operations at Omega, the cluster of Nuclear technology businesses (the largest in the UK) and offices at Birchwood Park (a designated Enterprise Zone), through to a diverse range of businesses located across Warrington's many industrial estates, with the Town Centre also being a focus for office development. • It is considered that Policy DEV4 will enhance, protect and provide further opportunities for a diverse range of jobs and employment opportunities across the Borough.
<ul style="list-style-type: none"> • No consideration given to employment development in other adjoining local authority areas, and the economic impact this will have on Warrington. 	<ul style="list-style-type: none"> • Warrington and its neighbouring authorities are all part of the wider economic sub-region and as part of the Local Plan Duty to Co-operate process have a duty to plan for strategic cross boundary issues such as employment development. • WBC need to plan for their own economic development land needs, whilst considering and understanding how the sub-regional economy operates. • The Council's updated EDNA (2021) provides analysis of Warrington's wider economic geography as well as concluding that based on rolling forward Warrington's historic land take-up as the main measure of need, Warrington's own employment land OAN is 316 hectares across the Plan period.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • Fiddlers Ferry Power Station is to close and will free up a large Brownfield site for development, within the Plan period. 	<ul style="list-style-type: none"> • The updated PSVLP (2021) now proposes to allocate the Fiddlers Ferry Power Station Site for employment uses with all the land coming forward within the Plan Period.
<ul style="list-style-type: none"> • There is no justification for the level of employment development proposed. Growth levels are based on the unsubstantiated ambitions of 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2021) using data which post-

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
the Strategic Economic Plan by the LEP and Warrington Means Business (Warrington & Co).	dates the EU Brexit referendum. The Council no longer considers the previous scale of jobs growth and economic ambitions to be realistic. However, the Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations.
<ul style="list-style-type: none"> The economic growth forecasts which drive the need for employment land are highly questionable. Logistics sector is not a desirable driver of growth. 	<ul style="list-style-type: none"> Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the town centre and inner Warrington. Through the update of the EDNA (2021), the Council has however revised down its estimate of future jobs growth.
<ul style="list-style-type: none"> No justification for the proposed employment development at Port Warrington. 	<ul style="list-style-type: none"> Port Warrington has now been removed in the updated PSVLP (2021) as an employment allocation.
<ul style="list-style-type: none"> Too much emphasis on the Logistics and distribution sector that generate low levels of jobs, that are generally in turn low paid and low skilled, and becoming increasingly automated, whilst taking up a huge amount of land. 	<ul style="list-style-type: none"> Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the town centre and the Waterfront. Through the update of the EDNA (2021), the Council has however revised down its estimate of future jobs growth.
<ul style="list-style-type: none"> Low paid and low skilled employees will not be able to afford house prices in the Garden Suburb, close to their employment. 	<ul style="list-style-type: none"> The Council considers that the Plan's housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the Borough.
<ul style="list-style-type: none"> Economic uncertainty associated with Brexit should be recognised. 	<ul style="list-style-type: none"> In line with national policy, The Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data. The economic forecast data used to inform the draft Local Plan post-dates the EU Referendum decision. Through the update of the Council's EDNA (2021), the Council has revised down its estimate of future jobs growth and is confident that a reduced

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
	housing target of 816 – in line with the Government’s Standard Housing Methodology in the updated PSVLP 2021, is sufficient to support the number of jobs anticipated to be created.
<ul style="list-style-type: none"> • No meaningful economic strategy for jobs and growth. 	<ul style="list-style-type: none"> • Warrington is home to a wide range of businesses. These range from major national and multi-national companies who have located their logistics operations at Omega, the cluster of nuclear technology businesses (the largest in the UK) and offices at Birchwood Park, through to a diverse range of businesses located across Warrington’s many industrial estates, with the Town Centre also being a focus for office development. • It is considered that Policy DEV4 will enhance, protect and provide further opportunities for a diverse range of jobs and employment opportunities across the Borough.
Landowner/Developer	
<ul style="list-style-type: none"> • Policy should not make a differentiation between local and wider strategic employment needs in this policy. It is unnecessary to do so. 	<ul style="list-style-type: none"> • This approach as set out in the Council’s updated EDNA (2021) is considered to be in line with the requirements of national planning policy, and this has been reflected in Policy DEV4.
<ul style="list-style-type: none"> • Exceptional circumstances for the removal of land for employment development is not made with the same clarity that is attempted for housing development in the plan. This should be re-assessed. 	<ul style="list-style-type: none"> • In relation to the updated PSVLP 2021 and revised employment allocations, the Council considers that ‘Exceptional Circumstances’ have been fully evidenced and clearly demonstrated for the proposed Green Belt release for the South East Warrington Employment Area.
<ul style="list-style-type: none"> • Supportive of the overall amount of employment land allocated to meet the economic needs of the Borough, and the use of a period of actual take up rates rolled forward. 	<ul style="list-style-type: none"> • Comments noted.
<ul style="list-style-type: none"> • Generally supportive of Policy DEV4 as a whole. 	<ul style="list-style-type: none"> • Comments noted. • It should be noted however that a number of changes have been made to the Policy in the updated PSVLP (2021)
<ul style="list-style-type: none"> • Supportive of the identification of the new employment area in the Garden Suburb, and the focus of warehousing and distribution in this location. 	<ul style="list-style-type: none"> • Comments duly noted, however; it should be noted that the previous employment area in the Garden Suburb is now a standalone employment area called the South East Warrington Employment Area, as it no longer

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
	falls with the same boundary as the wider residential allocation in the updated PSVLP (2021).
<ul style="list-style-type: none"> • Support for Policy DEV4 and Fiddlers Ferry provision. 	<ul style="list-style-type: none"> • Comments duly noted, however; it should now be noted that Fiddlers Ferry has been allocated as a new employment site in the updated PSVLP (2021).
<ul style="list-style-type: none"> • Need to understand the implications of not knowing the real amount of jobs that the allocation of 362ha of employment land will generate. It is Recommended that further work is done on this matter in order to clarify the number of homes needed to support economic growth in the Borough. It is imperative that the number of jobs and homes are aligned. 	<ul style="list-style-type: none"> • In line with national policy, the Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data. The economic forecast data used to inform the PSVLP 2021 post-dates the EU Referendum decision. • Through the update of the Council's EDNA (2021), the Council has revised down its estimate of future jobs growth and is confident that a reduced housing target of 816 – in line with the Government's Standard Housing Methodology in the updated PSVLP 2021, is sufficient to support the number of jobs anticipated to be created.
<ul style="list-style-type: none"> • Allocation of land at Cherry Lane would be in accordance with the locational benefits as described for the Garden Suburb, but with the advantage of retaining the Green Belt which separates the existing employment land from the M6 and benefits the area by providing a visual break between developments. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt, during and beyond the Plan period.
<ul style="list-style-type: none"> • The PDO was a 'pro-growth' strategy. It is now unclear on the rationale behind this change and the movement away / scaling back from the concept of Warrington New City. 	<ul style="list-style-type: none"> • The Council updated its economic forecast information following the PDO stage ahead of the previous PSVLP (2019) consultation. The revised jobs growth forecasts were lower, resulting in a corresponding reduction in the Local Plan housing target. • This trend has continued and through the update of the Council's EDNA and LHNA (2021), the Council has further revised down its estimate of future jobs growth and is confident that a reduced housing target of 816 – in line with the Government's Standard Housing Methodology in the updated PSVLP 2021, is sufficient to support the number of jobs anticipated to be created.

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The proposed allocation of 14.2ha of land at Howshoots Farm (to east of A50) does not have a durable boundary that is defined by a physical feature likely to remain permanent. 	<ul style="list-style-type: none"> • This part of the wider Garden Suburb allocation in the previous PSVLP (2019) has now been removed from the updated PSVLP (2021).
<ul style="list-style-type: none"> • Employment land within a new Lymm Garden village allocation would provide 23.8ha of B-Class Employment land within use classes B1c); B2 and B8, with an emphasis on the emerging market of large format logistics to help meet an identified regional need. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt.
<ul style="list-style-type: none"> • Continue to promote a site at Statham Meadows for employment uses and / or as a Motorway Service Area (MSA) given its proximity to Junction 21 of the M6 motorway. In the context of an evidenced need, the site would be a suitable allocation for MSA and / or for employment development. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. There is no requirement for the Plan to allocate land for a Motorway Service Area.
<ul style="list-style-type: none"> • There is a failure in the policy to make provision for long-term employment needs (2037-2047), non B use employment needs and for the expansion of the successful Winwick Quay industrial area. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. • It is acknowledged that the PSVLP (2021) employment land provision is marginally below the required need (316 ha) by around 8 ha. However; the Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period, and compensating for some losses of employment land to other uses.

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Should the western extension of Omega be approved following the S78 inquiry, then this could make a further contribution to meeting Warrington's employment land needs over and above the 31.22ha already agreed through the 'Duty to Cooperate'. • The Council has considered a number of other options for employment land allocations, but at present these have a range of significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements will have been delivered, and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • Policy fails to utilise the strength of the M62 corridor, with no employment allocations proposed in this part of the Borough. The Plan must include a wider range of allocations of different sizes, in a mix of locations, to provide choice and competition in the market. 	<ul style="list-style-type: none"> • The Council has considered potential employment sites on their own merits (including the assessment of sites made in the EDNA 2019 & 2021), with regard to their ability to meet market demands and a range of detailed site and sustainability criteria, including location, means of access and Green Belt performance. The Council considered a number of other employment sites, but these were not judged to perform as strongly as the allocated sites. • A number of sites to the north of Junction 8 and 9 of the M62 raised highways concerns. However, a westward extension (32ha) to the existing Omega employment site (adjacent to the M62), located in the Borough of St Helens has been agreed as counting towards Warrington's employment land need.
<ul style="list-style-type: none"> • Warrington should not be relying on land allocated in St Helens Draft Local Plan and situated in their Borough, to meet the needs of Warrington, as there is uncertainty in this regard. 	<ul style="list-style-type: none"> • The Omega expansion has been agreed in principle, subject to ensuring that satisfactory access arrangements, together with appropriate mitigation can be achieved. The Council has included the western

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
	extension in its Transport Modelling work and is confident that the principle of the allocation is robust.
<ul style="list-style-type: none"> • Question if the Masterplan land comprising 31.46 hectares within the Town Centre can be delivered, as Town Centres are facing significant economic challenges. 	<ul style="list-style-type: none"> • In the Council's updated EDNA (2021) and updated PSVLP (2021), the Masterplan land within the Town Centre has now been removed from the Council's employment land calculation and provision.
<ul style="list-style-type: none"> • The economic strategy is unduly pessimistic. 	<ul style="list-style-type: none"> • On the contrary, Warrington is home to a wide range of businesses. These range from major national and multi-national companies who have located their logistics operations at Omega, the cluster of nuclear technology businesses (the largest in the UK) and offices at Birchwood Park (a designated Enterprise Zone), through to a diverse range of businesses located across Warrington's many industrial estates and the Town Centre. • It is therefore considered that Policy DEV4 provides the platform for an optimistic economic strategy that will enhance, protect and provide further opportunities for a diverse range of jobs and employment opportunities across the Borough.
<ul style="list-style-type: none"> • Further Green Belt land needed to meet development needs and aspirations. 	<ul style="list-style-type: none"> • It is acknowledged that the revised PSVLP (2021) employment land provision is marginally below the required need (316 ha) by around 8 ha. However; the Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period, and compensating for some losses of employment land to other uses. • Should the western extension of Omega be approved following the S78 inquiry, then this could make a further contribution to meeting Warrington's employment land needs over and above the 31.22ha already agreed through the 'Duty to Cooperate'. • The Council has considered a number of other options for employment land allocations, but at present these have a range of significant

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
	<p>constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements will have been delivered, and the impacts of any further required employment allocations can be fully appraised.</p>
Statutory Consultees	
<ul style="list-style-type: none"> • Cheshire East Council: Need to consider whether the employment land allocations will lead to a surplus of supply for some industries, given some will be directly competing with sites in other Local Authority areas. 	<ul style="list-style-type: none"> • Warrington and its neighbouring authorities are all part of the wider economic sub-region and as part of the Local Plan Duty to Co-operate process have a duty to plan for strategic cross boundary issues such as employment development. • WBC need to plan for their own economic development land needs, whilst considering and understanding how the sub-regional economy operates. • The Council's updated EDNA (2021) provides analysis of Warrington's wider economic geography as well as concluding that based on rolling forward Warrington's historic land take-up as the main measure of need, Warrington's own employment land OAN is 316 hectares across the Plan period.
<ul style="list-style-type: none"> • Cheshire East Council: There will be an increased pressure on the Highway network due to the allocation of employment land in the Garden Suburb, which will need improvements to the highway network. 	<ul style="list-style-type: none"> • Through the Duty to Cooperate process, and the Statement of Common Ground the Council is in ongoing discussions with Highways England and Cheshire East Council to ensure both the Local and Strategic Road Network will have the required mitigation measures in place to accommodate new development.
<ul style="list-style-type: none"> • St Helens Council: Do not object to the employment target of 362 hectares, subject to it being kept under review, as the Plan progresses, to monitor the distribution of employment between the two Boroughs. 	<ul style="list-style-type: none"> • Comments duly noted, however; it should be noted that the revised employment land figure in the PSVLP (2021) is 316 hectares.

Policy DEV4 - Economic Growth and Development	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • St Helens Council: Supports the reference to Omega as a primary location for industrial, warehousing, distribution development and other B Class Uses. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • St Helens Council: Supports the reference to the St Helens Omega extension as being made available to count towards Warrington's need. This is consistent with the discussions undertaken through the DtC process. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • National Grid: There is a need to protect National Grid assets where development is proposed that could impact upon them. 	<ul style="list-style-type: none"> • Agree. Relevant polices in the updated PSVLP (2021) have been amended to ensure the assets of National Grid are protected where development is proposed, for example at the former Fiddlers Ferry Power Station.
Other	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •

Policy DEV5 - Retail and Leisure Needs	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Proposals should not cause existing centres to decline, concerns that town facilities are poor and the proposals do not support regeneration of the town centre by encouraging more working, living and shopping. 	<ul style="list-style-type: none"> The policy is written to support existing centres by identifying a retail hierarchy of centres and requiring proposals over 500 square metres gross to provide an impact test.
<ul style="list-style-type: none"> Retail proposals should be appropriate to the scale and size of existing centres and population needs. 	<ul style="list-style-type: none"> The policy is written to support existing centres by identifying a retail hierarchy of centres and requiring proposals over 500 square metres gross to provide an impact test.
<ul style="list-style-type: none"> The local centre proposed including the proposed retail and community facilities for village A in the garden suburb should be in Stretton an existing centre that has lost retail provision in recent years. 	<ul style="list-style-type: none"> The garden Suburb has been replaced by a significantly smaller allocation (Policy MD2 – The South East Warrington Urban Extension) in the updated PSVLP (2021). The policy requires the preparation of a comprehensive Development Framework to ensure a coordinated approach to new development across the whole of the Urban Extension allocation. This Framework will include a spatial masterplan that will determine the location of any new local centres and will be subject to consultation.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> Support for the identification of new centres in the Garden Suburb 	<ul style="list-style-type: none"> Support noted
<ul style="list-style-type: none"> Object to the classifications of centres as they are not in line with national policy as set out in the NPPF. 	<ul style="list-style-type: none"> The hierarchy of centres is the same as that identified in the Local Plan which was adopted in July 2014 and was found by the Inspector to be in line with then NPPF guidance which has not changed.
<ul style="list-style-type: none"> Amends of bullet points 4,5, and 7 of the policy to ensure consistency with the NPPF <ul style="list-style-type: none"> Bullet point 4 – the removal of the last sentence. Bullet point 5 adding - ‘a sequential approach to site selection consistent with the requirements as outlined in the NPPF and the NPPG.’ Bullet point 7 amending the size of development requirement justification from 500 square metres to 2,500 square metres. 	<ul style="list-style-type: none"> No reason to delete as consistent with the NPPF as it states that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. At paragraph 89(b) when considering application for retail development there is a requirement for an impact assessment to look at vitality and viability including local consumer choice and trade.

Policy DEV5 - Retail and Leisure Needs	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> Do not consider this change necessary as the sequential test needs to be agreed between the applicant and the local planning authority and will follow guidance as set out in the NPPG. Bullet point 7 is consistent with the NPPG as the guidance states that 2,500 square metres is to be used unless a different locally appropriate threshold is set by the local planning authority in line with the considerations set out in the guidance.
<ul style="list-style-type: none"> Gulliver’s World object to the wording and proposes that the sites listed in policy DC1 points 12 to 19 should be exempt from sequential testing. 	<ul style="list-style-type: none"> There is no need to amend the policy, in line with the NPPF paragraph 89 it defines where impact assessments should be made in proportion to development. The NPPF in chapter 7 (Ensuring the vitality of town centres) does not specify exemptions and to do so would allow developments to expand without recourse to testing the impact on the town centre uses and on surrounding areas.
<ul style="list-style-type: none"> Additional paragraph needed at 4.3 Meeting Warrington’s retail and leisure needs to identify major out of centre provision including junction 9 Retail Park and the Gemini centre. 	<ul style="list-style-type: none"> The policy is in line with guidance in the NPPF and NPPG supports the function of Warrington town centre and seeks to protect local services to enhance the sustainability of communities and residential environments. The guidance also specifies that town centre and shopping centre hierarchies should be identified, this does not include out of centre provision. The Retail Needs Assessment (2019) and update (2021) indicate that existing stores have the capacity to absorb needs over the plan period. This being the case then any development will need to meet sequential and impact tests as specified. This includes any out of centre proposals.
Statutory Consultees	
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none">
Other	
<ul style="list-style-type: none"> The Theatre Trust are concerned about the use of the word viable in relation to cultural facilities and the potential impact it might have, suggestion that viable is more closely defined or cultural facilities are removed from the policy. 	<ul style="list-style-type: none"> The Policy reflects the importance placed by National policy and the Council on the retention of community facilities including cultural facilities and the Policy is considered to provide appropriate protection to these facilities.

Objective W2 - To ensure that Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The Green Belt was instituted primarily to maintain the integrity of communities. Warrington has many local neighbourhoods and communities. The number of new houses proposed will completely alter the nature of the existing area, swamping the communities in Stretton, Appleton, Appleton Thorn, Grappenhall Heys and Grappenhall. 	<ul style="list-style-type: none"> The Council has concluded in line with paragraph 137 of the NPPF that it has demonstrated it has considered all other reasonable options for meeting its identified need for development. In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of some areas of Warrington that have been allocated for development. The Council has, however, ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities. It should be noted that whilst the majority of Green Belt release is proposed south of the Ship Canal, the majority of the total number of new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal. This continues the trend over recent years where the majority of new development in Warrington has taken place north of the Ship Canal.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> Support the need for the revised Green Belt boundaries 	<ul style="list-style-type: none"> Support noted It should be noted however that less Green Belt release is being proposed in the updated PSVLP (2021).
<ul style="list-style-type: none"> Concern that the plan does not maintain the permanence of the Green Belt in the long term, and safeguarded land is required. The Council's reasoning as to why safeguarded land is not required is unconvincing. 	<ul style="list-style-type: none"> The Council is confident that in respect of future housing needs, the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period in accordance with paragraph 136 of the NPPF. Given the Council is promoting major urban extensions as part of its spatial strategy, the Council has given consideration to an overall

Objective W2 - To ensure that Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.	
Summary of Issues Raised	Response
	<p>timescale of 30 years in accordance with paragraph 22 of the NPPF which requires Council's to provide a longer term vision when promoting such forms of development.</p> <ul style="list-style-type: none"> • With regard to employment land, the Council has considered a number of options for employment land allocations which could meet development needs beyond the end of the Plan Period. However, at present these options have a range of significant constraints. The Council does not currently have a sufficiently full enough understanding as to whether these constraints can be overcome to justify any further allocations to come forward later in the Plan period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • The CPRE though supporting the vision and objectives of the plan object to amount of Green Belt release specified particularly in South Warrington (ie. the Garden Suburb and South West Urban Extension). 	<ul style="list-style-type: none"> • The amount of land proposed to be released in the Updated PSVLP (2021) has reduced from 11% to 5%. • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban Extension in proximity to Walton and Moore Village or Port Warrington which would have resulted in the loss of part of Moore Nature Reserve. In addition, the South East Warrington Urban Extension is significantly smaller than the previous Garden Suburb allocation.
<ul style="list-style-type: none"> • The CPRE advocate more brownfield development and higher densities in inner areas. 	<ul style="list-style-type: none"> • The majority of new development will be within the existing urban area and brownfield sites will contribute significantly to development sites with higher densities of development encouraged on these sites. • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its brownfield register, both of which are updated on an annual

Objective W2 - To ensure that Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.

Summary of Issues Raised	Response
	<p>basis. The Council has also undertaken additional master planning work in the town centre and surrounding area to identify additional brownfield capacity. As such the Council is confident the Plan will maximise the amount of development that is possible on brownfield land.</p> <ul style="list-style-type: none">• The Updated PSVLP (2021) now includes the allocation of Fiddlers Ferry Power Station.

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Exceptional Circumstances have not been demonstrated to release Green Belt land for development. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East Warrington Employment Area, Warrington Waterfront, land to the east and south of Fiddlers Ferry Power Station and the Outlying Settlements. • Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> • Brownfield sites should be used first, for example Fiddlers Ferry and Town Centre sites, before any Green Belt is released for development. 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its brownfield register, both of which are updated on an annual basis. The Council has also undertaken additional master planning work in the Town Centre and surrounding area to identify additional brownfield capacity. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land.

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The updated Plan now proposes to allocate the Fiddlers Ferry Power Station Site for development, the majority of which will come forward in the Plan Period. • The potential of other Brownfield sites, for example the Unilever site have been considered through the town centre master planning process. They are considered to provide potential additional development capacity, although there is insufficient certainty at present for these sites to be included within the Council's identified residential or employment land supply. These, together with other potential brownfield sites, are part of the reason why the Council does not consider it needs to remove land from the Green Belt for 'safeguarding' for development beyond the Plan period. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
<ul style="list-style-type: none"> • Given the Climate Change emergency, Green Belt needs to be preserved, not released for development. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release for development. • The Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on Climate Change through the Sustainability Appraisal process. The Council has strengthened reference to Climate change in the vision and objectives of the Updated Proposed Submission Version Local Plan to reflect the Council having declared a Climate Emergency. A number of the Local Plan policies include specific provision to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change. The Council has also published an addendum

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	to the Sustainability Appraisal Report which gives specific consideration to the 2020 Heathrow Airport 3rd Runway High Court judgment.
<ul style="list-style-type: none"> • Green Belt release will be detrimental to wildlife, our health and well-being and the Agricultural industry. 	<ul style="list-style-type: none"> • The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process.
<ul style="list-style-type: none"> • Green Belt boundaries were only confirmed 5 years ago in the current Local Plan, to supposedly last for 20 years, so why change them now? 	<ul style="list-style-type: none"> • Following the High Court ruling in 2015 which quashed the housing target in the Council's adopted Local Plan Core Strategy (2014), the Council sought to update its housing policies. However, it became clear that the Borough's development needs going forward could no longer be met within the existing urban area, without exploring the need to release Green Belt land to meet identified development needs. The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development needs and demonstrated that Exceptional Circumstances exist in order to do so.
<ul style="list-style-type: none"> • Warrington's Green Belt fulfils an important role in ensuring the separation of Warrington from neighbouring towns and cities and preventing urban sprawl extending into the countryside. 	<ul style="list-style-type: none"> • The Council's Green Belt Assessment is a key evidence base underpinning the Plan's spatial strategy. By focussing Green Belt release in the least sensitive areas and by providing strong protection, the vast majority of Warrington's Green Belt that will remain, the Council is confident that the Plan will ensure Warrington does not merge with other towns. The Council considers the revised Green Belt boundaries will ensure the long term integrity of the Green Belt and will endure well beyond the end of the Plan period.
<ul style="list-style-type: none"> • Green Belt release will change the character of the villages and the town forever and Green Belt should be protected from development. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that the development proposed will change the character of some areas of Warrington that have been allocated for development. The Council has, however,

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<p>ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities.</p> <ul style="list-style-type: none"> • New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements.
<ul style="list-style-type: none"> • Over optimistic growth forecasts, above those required by Government do not constitute Exceptional Circumstances. 	<ul style="list-style-type: none"> • The previous PSVLP (2019) target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. • Through the update of the Council's EDNA (2021) and LHNA (2021), the Council no longer considers this scale of jobs growth to be realistic and has therefore based it aligned housing and growth ambitions on the Government's Standard Housing Methodology. • The Updated PSVLP (2021) now proposes a housing requirement of 816 homes per annum and 316 hectares of employment land. This compares to a requirement of 945 homes per annum and 362 hectares of employment land proposed in the Previous PSVLP (2019).
<ul style="list-style-type: none"> • Planning application for the Stobart and Langtree sites in the Green Belt are premature. 	<ul style="list-style-type: none"> • Comment noted. However, the submission of planning applications ahead of the adoption of the PSVLP is outside the control of the Local Planning Authority. Given the stage of preparation of the previous PSVLP (2019) and now a further Regulation 19 consultation on a revised PSVLP (2021), it is considered that an argument on the grounds of prematurity could not be sustained until the Plan is formally submitted to the Secretary of State for independent Examination.
<ul style="list-style-type: none"> • The Plan does not take into account the 5 purposes of the Green Belt as set out in the NPPF. 	<ul style="list-style-type: none"> • As part of the Council's Local Plan evidence base, a full assessment of Warrington's Green Belt was undertaken to ensure the release of lower performing areas of Green Belt. This was assessed against the 5 purposes of Green Belt as set out in National Planning Policy, to understand the function of all of the Borough's Green Belt.

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> The Green Belt Assessment has been one of the key factors that has informed the Plan's spatial strategy and individual site allocations.
<ul style="list-style-type: none"> The preparation of a new Local Plan is not, of itself, an exceptional circumstance to justify amendments to the Green Belt. 	<ul style="list-style-type: none"> That is correct. However, where Exceptional Circumstances have been fully evidenced and justified to amend Green Belt boundaries, as is the case for Warrington, then in line with par.140 of the NPPF, Green Belt boundaries should only then be altered through the Plan making process.
<ul style="list-style-type: none"> Do not believe that Policy GB1 represents sensitive Green Belt release or will ensure the permanence of the Green Belt, as suggested. 	<ul style="list-style-type: none"> The Council's Green Belt Assessment is a key piece of evidence underpinning the Plan's spatial strategy and this had been reflected in Policy GB1. By focussing Green Belt release in the least sensitive areas and by providing strong protection, the vast majority of Warrington's Green Belt (95%) will remain. The Council considers the revised Green Belt boundaries will ensure the long term integrity of Warrington's Green Belt and will endure well beyond the end of the Plan period.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> The revised National Planning Policy Framework strengthened the protection of the Green Belt. Exceptional circumstances have not been demonstrated to release Green Belt land for development. 	<ul style="list-style-type: none"> In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<p>Warrington Employment Area, Warrington Waterfront, land to the east and south of Fiddlers Ferry Power Station and the Outlying Settlements.</p> <ul style="list-style-type: none"> • Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> • The loss of Green Belt in South Warrington's is disproportionate. There are areas of North and North East Warrington (Burtonwood, Winwick, Croft and Culcheth) which could accommodate expansion without conflict with this purpose of the Green Belt. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. • It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP (2021) and that the majority of the new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal.
<ul style="list-style-type: none"> • A plan setting a housing target at the Government's level and for only 15 years would mean there is no need, at this point, for any Green Belt release. 	<ul style="list-style-type: none"> • The Plan period is consistent with National Planning Policy which requires a Local Plan to cover a 15 year period, post adoption, as is the case here. This is based on the likelihood that the Plan will be adopted in mid-2023. The Council has however re-based the updated Proposed Submission Version Local Plan with a start date of 2021. This results in a total Plan Period of 18 years, as opposed to the previous 20 year period.
<ul style="list-style-type: none"> • Green Belt boundaries were only set 5 years ago and were supposed to last for 20 years. 	<ul style="list-style-type: none"> • Following the High Court ruling in 2015 which quashed the housing target in the Council's adopted Local Plan Core Strategy (2014), the Council sought to update its housing policies. However, it became clear that the Borough's development needs going forward could no longer be met within the existing urban area, without exploring the need to release Green Belt land to meet identified development needs.

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development needs and demonstrated that Exceptional Circumstances exist in order to do so.
<ul style="list-style-type: none"> Confused detail over the boundary of Grappenhall Village as a Green Belt Settlement. Grappenhall Village is noted as a Green Belt settlement but appears to be separated from the Green Belt by proposed development. 	<ul style="list-style-type: none"> Grappenhall Village is to be retained in the Green Belt (as a Green Belt Settlement) and will no longer form part of the main existing urban area in the Updated PSVLP (2021).
<ul style="list-style-type: none"> Support the rejection of Green Belt sites in north Warrington. 	<ul style="list-style-type: none"> Comments noted.
<ul style="list-style-type: none"> The proposed Port Warrington allocation will result in Warrington's employment areas almost touching Halton's employment areas as proposed in their Proposed Submission Local Plan, effectively eliminating any meaningful gap between the two towns. This is contrary to the purpose of the Green Belt in preventing neighbouring towns from merging, to the extent that the Green Belt's role in this regard will be lost in this location. 	<ul style="list-style-type: none"> The Green Belt Assessment undertaken to support the PSVLP (2019) recognised the significance of the Green Belt in this area and in maintaining separation between Runcorn and Warrington. The remaining Green Belt in between the western extent of the development/urban area and Moore Village was identified as a strategic gap to be protected in the PSVLP (2019). However, post the previous PSVLP 2019 consultation, the revised Spatial Strategy has resulted in Port Warrington being removed as an employment allocation in the updated PSVLP (2021).
<ul style="list-style-type: none"> Plan making and decision-taking should consider the consequences for sustainable development of any review of Green Belt boundaries. Patterns of development, resource use (including agricultural land) and additional travel are clearly relevant. The current proposals do not include an assessment of the consequences for sustainable development in relation to releasing Green Belt land. 	<ul style="list-style-type: none"> In demonstrating the Exceptional Circumstances required to amend Green Belt boundaries, the Council has demonstrated the consequences for this on sustainable patterns of development through the Sustainability Assessment process and the Spatial Options Assessment of proposed development locations, in support of the 2019 and 2021 PSVLP.
<ul style="list-style-type: none"> Revised NPPF strengthens the protection for Green Belt. 	<ul style="list-style-type: none"> In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'.
<ul style="list-style-type: none"> • Brownfield sites should be used first, for example Fiddlers Ferry. 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its brownfield register, both of which are updated on an annual basis. The Council has also undertaken additional master planning work in the Town Centre and surrounding area to identify additional brownfield capacity. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The updated Plan now proposes to allocate the Fiddlers Ferry Power Station Site for development, the majority of which will come forward in the Plan Period. • The potential of other Brownfield sites, for example the Unilever site have been considered through the town centre master planning process. They are considered to provide potential additional development capacity, although there is insufficient certainty at present for these sites to be included within the Council's identified residential or employment land supply. These, together with other potential brownfield sites, are part of the reason why the Council does not consider it needs to remove land from the Green Belt for 'safeguarding' for development beyond the Plan period. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
Landowner/Developer	
<ul style="list-style-type: none"> • Fully supportive of the Green Belt review as a starting point for the future development of the Borough in line with many other Local Authorities in the surrounding area. 	<ul style="list-style-type: none"> • Comments duly noted.

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Fully supportive of the removal of land from the Green Belt for development needs in various identified areas across the Borough and there after keeping the Green Belt boundaries consistent up to at least 2047. 	<ul style="list-style-type: none"> Comments duly noted. It should be noted that less land is proposed to be removed from the Green Belt in the updated PSVLP (2021).
<ul style="list-style-type: none"> Do not agree with the designation of Stretton as a Green Belt settlement as it conflicts with point 3 of the policy as the village lies adjacent to and needs to be included as an integral part of Village A, one of the three villages proposed in the Garden Suburb. 	<ul style="list-style-type: none"> The original Green Belt settlement boundary for Stretton (Policy CC1) as set out in the Council's Local Plan Core Strategy (2014) has been incorrectly drawn on the previous PSVLP (2019) Proposal's Map, and was dissected by the previous Garden Suburb boundary, but still shown as an 'Washed Over' Green Belt Settlement in full. It is not considered that any material changes in circumstances have occurred that warrant the whole removal of Stretton from the Green Belt, with the A49 being considered a robust and defensible Green Belt boundary. Therefore, the half of Stretton Village to the west of the A49 will remain in the Green Belt as a Washed Over Settlement in the updated PSVLP 2021, with the area to the east of the A49 now being part of the smaller South East Warrington Urban Extension, and so removed from the Green Belt.
<ul style="list-style-type: none"> There needs to be safeguarded land identified and allocated to meet residential and employment development needs beyond the Plan period. Not enough land has been save guarded to meet long term development needs. 	<ul style="list-style-type: none"> The Council considers that there will be sufficient land supply to meet the level of housing need for at least 12 years following the end of the Plan period. The Council is therefore confident that there is no need for any safeguarding of land in respect of future housing needs and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period. Although the required employment land need is marginally below the required need by around 8 ha, the Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period. Should the western extension of Omega be

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<p>approved following the S78 inquiry, then this could make a further contribution to meeting Warrington's employment land needs.</p> <ul style="list-style-type: none"> • The Council has considered a number of other options for employment land allocations, but at present these have a range of significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised
<ul style="list-style-type: none"> • It is considered that Exceptional Circumstances have been evidenced and demonstrated to remove land from the Green Belt for residential and employment development needs. 	<ul style="list-style-type: none"> • Agreed. The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt land proposed for release. • It should be noted that less land is being proposed to be removed from the Green Belt in the updated PSVLP (2021)
<ul style="list-style-type: none"> • Recommend adding to the wording to acknowledge NPPF reference to planning positively to enhance the beneficial use of Green Belt once the boundaries have been defined. 	<ul style="list-style-type: none"> • New Policy wording has been added to Policy GB1 and all of the proposed main Green Belt and Outline Settlement allocations in the updated PSVLP (2021) in line with the requirements of the NPPF (2021) for compensatory improvement measures.
<ul style="list-style-type: none"> • There needs to be a review of the Washed Over and Green Belt Settlements, and the settlements of Stretton and Grappenhall should be removed from the list of settlements to be washed over by Green Belt in light of the proposed Garden Suburb allocation. 	<ul style="list-style-type: none"> • It is considered that since the adoption of the Local Plan Core Strategy (2014), there have been no material change in circumstances to warrant a complete review of Washed Over and Green Belt settlements. The exception to this, as proposed in the revised PSVLP 2021, is an amendment to Stretton's Green Belt boundary, due to the SEWUE allocation.

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • No evidence that Neighbourhood plans will identify further land in the Green Belt for development. 	<ul style="list-style-type: none"> • There is no need to set out evidence that Neighbourhood Plans will identify Green Belt land for development above that identified in the Strategic policies within the PSVLP. The NPPF at paragraph 140 is clear that once changes to Green Belt boundaries have been made through strategic policies, detailed amendments may be made through non-strategic policies, including Neighbourhood Plans.
Statutory Consultees	
<ul style="list-style-type: none"> • St Helens Council acknowledges the evidenced need to review Green Belt boundaries in Warrington and supports the provisions of Policy GB1. St Helens Council notes that the Plan, whilst continuing the previous commitment to regenerate urban areas and brownfield sites, also includes a substantive review of Green Belt boundaries to allow future development needs to be fully met. This approach is in line with that being undertaken by St Helens in its own emerging Local Plan and is supported. 	<ul style="list-style-type: none"> • Comments duly noted.
Other	
<ul style="list-style-type: none"> • Exceptional circumstances have not been demonstrated to release Green Belt land for development. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East

Policy GB1 - Warrington's Green Belt, including (part 3.4 Demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<p>Warrington Employment Area, Warrington Waterfront, land to the east and south of Fiddlers Ferry Power Station and the Outlying Settlements.</p> <ul style="list-style-type: none"> • Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt land fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.

Objective W3 - To strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub, whilst transforming the quality of the public realm and making the Town Centre a place where people want to live.	
Summary of Issues Raised	Response
<i>Residents</i>	
• None.	•
<i>MP, Local Borough, Town or Parish Councillor</i>	
• None.	•
<i>Landowner/Developer</i>	
• None.	•
<i>Statutory Consultees</i>	
• None.	•
<i>Other</i>	
<ul style="list-style-type: none"> • CPRE Cheshire welcomes the Local Plan vision as set out in the six key objectives and supports the focus of development at Warrington Town Centre. • CPRE note the 10% windfall allowance and urge this is increased to 15% based on past trends. 	<ul style="list-style-type: none"> • Support noted. • There is no calculation for a windfall allowances which is not a requirement for the SHLAA. The vast unaccounted sites that contribute to the SHLAA are under 0.25 ha therefore there is a small sites allowance based on a rolling 10 year average this is presently at 14.2%

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The proposals are not enough to act as a catalyst to the regeneration of the town centre and the proposed growth in the south of the Borough will merely continue the pattern of commuting into Manchester as the major economic growth location in the north of England, for working, shopping and leisure. The congestion and poor access from South to North will make it even more compelling for people to go to Manchester and the Trafford Centre or Chester and Cheshire oaks. The journey time is about the same. 	<ul style="list-style-type: none"> • The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington. This includes provision of major transport improvements and proposals to improve accessibility to the town centre generally and to Warrington Bank Quay and Warrington Central Rail Stations. The Local Transport Plan (LPT4) also commits the Council to start work to test the feasibility of a new mass transit system for the Borough. In addition, the Council have recently adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in respect of the sustainable redevelopment of brownfield sites in the town centre. The SPD also reflects other forward-looking Council documents including The Town Centre Masterplan (2019), the First and Last Mile Transport Masterplan (2020) and the Central 6 Masterplan (2020). These documents look to increase residential development in the town centre; rationalise vehicular access into the town centre and improve sustainable transport opportunities; and create a quality environment for new and existing residents.
<ul style="list-style-type: none"> • There is general support for Policy aspirations for regeneration and bring residential uses back into the town centre to revitalise it and support shopping and business regeneration. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • There is concern that not all brownfield sites are being used and the potential for high density living maximised to minimise the amount of Green Belt release required. • The town centre is currently a disgrace with many empty and derelict buildings and brownfield sites and this policy will not address these issues. It is unjustifiable to take valuable land out of the Green Belt until all Brownfield sites have been utilised. The centre of Warrington has many such brownfield sites and also has an excess of empty retail space 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council has also undertaken additional master planning work in the town centre and surrounding area to identify additional brownfield capacity. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. The Local Plan contains policies which support bringing empty properties

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
<p>which should be re-purposed as housing before removing further land from the Green Belt. This would be a very effective way to regenerate Warrington's town centre.</p>	<p>back into use and which support residential development in the town centre and other shopping centres, including vacant space above shops. The updated PSVLP, also proposes to allocate the major brownfield site at Fiddlers Ferry Power Station as well as giving specific consideration to potential of large brownfield sites, such as Warrington Hospital. In addition, the Council have recently adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in respect of the sustainable redevelopment of brownfield sites in the town centre. The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.</p>
<ul style="list-style-type: none"> • The Bridge Street area in particular has lost its vibrancy as a retail area. Instead it is now a no-go area in the evening due to late night bars and clubs. WBC should demonstrate HOW they are going to be able to attract retailers back to that location. 	<ul style="list-style-type: none"> • The policy supports new retail development in the Primary Shopping Area (PSA). The upper part of Bridge Street lies within the PSA as defined on the Policies map. The whole of Bridge Street lies within the Bridge Street Quarter Masterplanning area, within which there has been a significant amount of re-development, including the relocation of the Indoor Market and new Council offices.
<ul style="list-style-type: none"> • For regeneration of the town centre to be successful people need to be able to access it easily. Currently the traffic congestion is atrocious. There are two stations in Warrington but accessing them and parking is difficult. Only by improving the public transport will there ever be an encouragement for people to get out of their cars and use public transport. There are no proposals for park and ride facilities. The plan does nothing to address this. 	<ul style="list-style-type: none"> • The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington. This includes provision of major transport improvements and proposals to improve accessibility to the town centre generally and to Warrington Bank Quay and Warrington Central Rail Stations. The Local Transport Plan (LPT4) also commits the Council to start work to test the feasibility of a new mass transit system for the Borough. In addition, the Council have recently adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in respect of the sustainable redevelopment of brownfield sites in the town centre. The SPD also reflects other forward-looking Council documents including the First and Last Mile Transport Masterplan (2020), which looks to rationalise

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
	vehicular access into the town centre and improve sustainable transport opportunities.
<ul style="list-style-type: none"> Town Centre have many of fine historic buildings, conservation areas and spaces (Bridge Street, Buttermarket Street, Palmyra Square + Queens Gardens, the Town Hall, the Transporter Bridge, together with the spires and towers of its churches. These are important historic assets that people value and which reflect the historic character of the town. These heritage assets should be conserved and their settings positively enhanced as part of the regeneration of the Town Centre. 	<ul style="list-style-type: none"> Comments noted. Policy TC1 together with the historic environment policy (DC2) and the Warrington Waterfront policy (MD1) all contain criteria that seek to conserve and enhance the town centres historic assets.
<ul style="list-style-type: none"> The Plan is vague and contains no detail of how the Town Centre of Warrington will be regenerated or of how the distinctive character of our area will be preserved, both of which are Warrington Council policy objectives. 	<ul style="list-style-type: none"> There is no need to change the policy. The policy in conjunction with its supporting text is considered to contain a sufficient level of detail to explain the Council's vision for the town centre; how it is proposed to be regenerated and the parts of it that need to be preserved. In addition, the Council have recently adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in respect of the sustainable redevelopment of brownfield sites in the town centre, whilst preserving and enhancing its existing heritage assets.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> General support for regeneration of the town centre. There must be a renewed focus on improving the housing, services, leisure and retail mix. 	<ul style="list-style-type: none"> Support noted. This is the clear intention of Policy TC1.
<ul style="list-style-type: none"> Croft, Culcheth and Winwick Parish Council's welcome the review of housing densities and those proposed for the town centre are now considered to be more appropriate. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> Croft, Culcheth and Winwick Parish Council's consider that there is a disconnect between the proposed key areas of growth and that the town centre, which contradicts ambitions to strengthen viability and vitality. The inaccessibility of the town centre from the areas of South Warrington which are the subject of development proposals and the focus on employment land for logistics functions, do not support town centre regeneration. 	<ul style="list-style-type: none"> The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential economic benefits of focussing development, including that proposed in south Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington. The Council has

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
	<p>assessed the level of development proposed in the Plan through the Warrington Multi-Modal Transport model. A series of key transport infrastructure improvements are required to support the proposed development allocations and the Plan as a whole. These include the Western Link and the Centre Park Link, which will directly relieve traffic congestion from the town centre. Proposals to improve accessibility to the town centre will also improve access to Warrington Bank Quay and Warrington Central rail stations. Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. As such the Local Transport Plan identifies a specific work stream to begin the options assessment process for a new crossing within the first 5 years following its adoption. The Local Transport Plan also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.</p>
<ul style="list-style-type: none"> • Croft, Culcheth and Winwick Parish Council’s consider that the Plan misses the opportunity to explore relocation of the outdated Warrington Hospital on to a site within the town centre connected with accessible transport facilities and the means of releasing the existing site to residential development. 	<ul style="list-style-type: none"> • The Plan gives specific consideration to Warrington Hospital. Policy INF4 (Parts 3 and 4) provides support for the development of a new hospital for Warrington. However, the review of NHS service delivery across the North West region is still at an early stage and there is insufficient certainty at present for this site to be included within the Council’s identified residential or employment land supply. The Council is committed to working with the NHS Hospital Trust to deliver a new hospital either through redevelopment of the existing Lovely Lane site or on a new site.
<ul style="list-style-type: none"> • Croft, Culcheth and Winwick Parish Council’s consider that proposals for retail in the town centre seek to buck the trend for High Street development and there is no indication of how jobs growth and particularly higher value jobs will be created (Croft, Culcheth and Winwick Parish Council’s). 	<ul style="list-style-type: none"> • The NPPF requires retail (and other “main town centre uses”) to be located in identified town centres. The Council’s updated Retail Needs Assessment (2019), as confirmed in the 2021 Update, supports the refocusing of retail activity towards the Town Centre to support and build on the strength of the Golden Square Shopping Mall and the Bridge Street Quarter/Time Square re-development.

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Croft, Culcheth and Winwick Parish Council's consider that flexibility should be built into town centre allocations so that plots can be developed tactically. This would mean a change in the split so that there is more residential or mixed development and less pure commercial or retail. Flexibility should be built in so that buildings are designed with conversion in mind. If 5ha of town centre or riverside land was re-designated for housing, then at 100 dph, additional 500 dwellings could be provided. 	<ul style="list-style-type: none"> • The NPPF requires plans to provide a positive vision for the future of each area and to be prepared in a way that is aspirational but deliverable (paragraphs 15 and 16). The Council's economic and regeneration strategy seeks to deliver the Council's aspirations for the Town Centre and surrounding areas and associated masterplanning work demonstrates how this can be achieved making the most effective use of land. However, it is not fixed in stone and provides a framework for the future regeneration of specific areas that may change over time, dependant up on opportunities to relocate certain facilities and market conditions.
<ul style="list-style-type: none"> • There are detailed issues with the town centre allocations. For instance, Parcel C3 (Cockhedge ASDA) has been shown as being retained in commercial use rather than mixed use, apparently after representations. This site is very close to the centre and unsuited to long term use as a conventional supermarket with expansive surface car parking. Retention as a purely commercial site risks wasting an area with high public transport accessibility. There is an opportunity for a high-quality mixed-use, residential led development. In addition, there is misplaced ambition over sites such as the stadium quarter and the failure to note the potential for redevelopment of the site of New Town House are demonstrative of the muddled thinking of the Plan. 	<ul style="list-style-type: none"> • The Council have recently adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in respect of the sustainable redevelopment of brownfield sites in the town centre. The SPD reflects other forward-looking Council documents including The Town Centre Masterplan (2019), the First and Last Mile Transport Masterplan (2020) and the Central 6 Masterplan (2020). It identifies NTH and parts of the retail park at the Cockhedge Centre as re-development opportunities.
<ul style="list-style-type: none"> • Cllr supports the use of vacant sites for housing; more people living in the town centre would revitalise it and there would be less pressure on the road network. In contrast, if traffic congestion increases because of all the out-of-town housing developments, then fewer people will visit the town centre and its decline will continue. An increased use of the town centre for housing means that less housing will be required on the Green Belt. Development should start in the Town Centre, not on the fringes of the town. 	<ul style="list-style-type: none"> • Support noted.
Landowner/Developer	

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Wallace Land Investments agrees with Policy TC1 to support the role of Warrington Town Centre, and the regeneration of the surrounding areas. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> Miller Homes have a number of concerns with the identified Key Development Sites in the Town Centre in terms of capacity and deliverability (to include development in the Southern Gateway being in FZ2 and FZ3). It is considered that the Council has over-estimated the scale of development, the proposed density and the timescales envisaged for the delivery of the Town Centre regeneration sites and Southern Gateway. 	<ul style="list-style-type: none"> The Council is confident that its assumptions about the development potential and capacity of sites in the Town Centre are robust. The Council have recently adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in order to facilitate the delivery of brownfield sites in the town centre.
<ul style="list-style-type: none"> The master planned capacity of high density dwellings is 140dph whereas Policy TC1 refers to a density of 130dph. 	<ul style="list-style-type: none"> Policy DEV1 (referenced in Policy TC1) specifies a minimum density requirement. The master planning work is looking at the development potential.
Statutory Consultees	
<ul style="list-style-type: none"> St Helens Council support the provisions of Policy TC1 and its supporting text, particularly the emphasis on refocussing retail and other town centre development within Warrington Town Centre as set out in paragraph 6.1.21. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> Historic England support the provisions of this policy, subject to a minor amendment to the wording of paragraph 9(a), which should be amended to read: 'ensure <u>the historic environment and heritage values and assets</u> are sustained, <u>conserved</u> and enhanced'. 	<ul style="list-style-type: none"> The policy has been amended as outlined by Historic England.
Other	
<ul style="list-style-type: none"> The Theatres Trust supportive of the plan's positive support for additional cultural venues and specifically theatres, which reflects paragraphs 20 and 92 of the NPPF. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> A local business considers that to regenerate the town centre people need to be able to access it more easily. Currently traffic congestion is atrocious. The Plan does nothing to address this. 	<ul style="list-style-type: none"> The emerging Local Transport Plan (LTP4) seeks to support the regeneration of the Town Centre through a "Town Centre Area Travel Plan" that will deliver a range of sustainable travel initiatives. Also, there are existing transport infrastructure schemes that are either under construction (the Centre Park Link) or have received funding (the

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
	<p>Western Link) that will help address existing congestion in the town centre.</p> <ul style="list-style-type: none"> • In addition, the Council have recently adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in respect of the sustainable redevelopment of brownfield sites in the town centre. The SPD also reflects other forward-looking Council documents including the First and Last Mile Transport Masterplan (2020), which looks to rationalise vehicular access into the town centre and improve sustainable transport opportunities.

Objective W4 To provide new infrastructure and services to support Warrington's growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The plan only gives outline details of the proposed Western Link Relief Road and the strategic road through the proposed Garden Suburb, there are no specifics on highway infrastructure improvements and the plan does not address existing issues with traffic congestion. No further development should be permitted until these issues are addressed. 	<ul style="list-style-type: none"> The Council is committed to the delivery of the Western Link Relief Road, a planning application is expected in autumn 2021 with a start on site expected 2023. The revised South East Warrington Urban Extension allocation is significantly smaller than the previous Garden Suburb allocation, which will reduce the pressure on the surrounding transport network. The allocation policy requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Local Plan Transport Model to ensure the transport network can accommodate the proposed level of growth.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Statutory Consultees	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Other	
<ul style="list-style-type: none"> The CPRE supports the vision set out in the plan to deal with climate change issues and urges for investment in infrastructure that supports a zero net carbon footprint in the future. 	<ul style="list-style-type: none"> Support noted. In line with the NPPG paragraph 152 the Plan is supporting a transition to a low carbon future in a changing climate. This includes through its policies reducing dependency on the car, supporting public transport, cycling and walking and identifying the need for investment in carbon neutral and zero infrastructure.

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Lack of a clear commitment for the provision of an additional Ship Canal crossing, the plans are very vague. 	<ul style="list-style-type: none"> • Transport Modelling carried out to support the development of the PSVLP (2019) and the updated PSVLP (2021) has identified that a new road crossing of the ship canal is not critical to the delivery of the growth proposals set out in the Plan. • However, a number of issues will require further study and assessment over the first five years of the Local Plan and Local Transport Plan 4 (LTP4- 2019) to understand what further transport improvements may be required. This could include assessing the need for a further crossing over the Manchester Ship Canal to facilitate movement from south to north.
<ul style="list-style-type: none"> • Poor transport strategy lacking in essential detail for such a large amount of growth, with the required infrastructure being aspirational, not planned, not confirmed, or costed. 	<ul style="list-style-type: none"> • The Council's LTP 4 was progressed in parallel with the PSVLP (2019) to ensure both spatial strategies were integrated. • The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the PSVLP in 2019 and again in 2021. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the PSVLP (2021) is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.
<ul style="list-style-type: none"> • Does not take into account Warrington's unique travel and transport constraints; River, Canals, Motorways. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the 2019 and 2021 PSVLP through the Warrington Multi-Modal Transport model. The model represents the existing transport networks within Warrington and performance at present, taking into account constraints such as Rivers, Canals and the Motorway network, both internal and external to the Borough.

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Nothing to suggest that the already horrendous traffic congestion will get any better, or that poor air quality will be improved through sustainable travel measures. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the 2019 and 2021 PSVLP through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network. A series of key transport infrastructure improvements are therefore required to support the proposed development allocations and the PSVLP (2021) as a whole.
<ul style="list-style-type: none"> • No new routes proposed from the south of the Town in to the Town Centre. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the in the 2019 and 2021 PSVLP through the Warrington Multi-Modal Transport model. A series of key transport infrastructure improvements are therefore required to support the proposed development allocations and the PSVLP (2021) as a whole. Although transport modelling has identified that a new crossing of the Ship Canal from the south to the north is not required to support the proposed development in the Plan as a whole, the proposed Western Link Road will be an additional crossing of the Ship Canal.
<ul style="list-style-type: none"> • Need other solution provided to the old Victorian Swing bridges to cross Waterways, which are already at capacity, and entirely in third party ownership. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. As such the Local Transport Plan (2019) identifies a specific work stream to begin the options assessment process for a new crossing within the first 5 years following its adoption.
<ul style="list-style-type: none"> • Port Warrington will increase the use of the Ship Canal and result in more bridge swings, further restricting the movement of people from the south of the Borough in to the Town Centre. 	<ul style="list-style-type: none"> • Since the signing of a Memorandum of Understanding with Peel Ports (who own and operate the canal) in May 2014, peak period sailings have fallen year on year. The Council continues to work with Peel Ports regarding improvements to help traffic movement in Warrington.
<ul style="list-style-type: none"> • Development of the scale proposed should provide a real alternative to the use of the car. Jobs and homes should be co-located. 	<ul style="list-style-type: none"> • An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area, of which the majority will be located north of the Ship Canal, the Spatial Strategy is ensuring that a large number of new homes will benefit

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
	from being in proximity to established and newly developed employment locations. Through ensuring improvements to transport infrastructure, new and existing residents in Warrington will be able to access these employment opportunities. The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling.
<ul style="list-style-type: none"> • Policy INF1 is contradicted by site allocations and makes no provision for the very high levels of traffic new development will generate, or the impact of it on the local and motorway network. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the 2019 and 2021 PSVLP through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network. A series of key transport infrastructure improvements are therefore required to support the proposed development allocations and the Plan as a whole.
<ul style="list-style-type: none"> • Policy will not address the impacts of climate change or air pollution. 	<ul style="list-style-type: none"> • A number of the Local Plan policies include specific provisions to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change. It is considered that one such policy, Policy INF1 contains a number of specific provisions to deliver sustainable transport solutions to tackle climate change and to improve air quality.
<ul style="list-style-type: none"> • Walking and cycling just will not happen for travel to work, as people in the south of the Borough travel to high paid jobs out of the Borough. This will also be the case in relation to people from the south travelling in to the Town Centre. 	<ul style="list-style-type: none"> • An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area, of which the majority will be located north of the Ship Canal, the Spatial Strategy is ensuring that a large number of new homes will benefit from being in proximity to established and newly developed employment locations, accessible by cycling and walking. Through ensuring improvements to transport infrastructure, new and existing residents in south Warrington will be able to access these employment opportunities. The Council recognises the importance of improving

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
	transport links to the new employment locations, particularly in respect of public transport, walking and cycling.
<ul style="list-style-type: none"> • Failure to connect the south of the Borough to the rail network, given the amount of growth in this part of the Borough is not promoting sustainable travel and will not reduce the reliance on the car. 	<ul style="list-style-type: none"> • Whilst the lack of rail travel options in this part of the Borough is accepted, the Council has adopted its Local Transport Plan 4 (LTP4) and it contains measures and proposals to ensure sustainable travel is embedded in the Local Plan. For example, LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough. The infrastructure proposals to improve access into the Town Centre will therefore also improve access to Warrington Bank Quay and Warrington Central Train Stations.
<ul style="list-style-type: none"> • Public Transport is inadequate for most, if not all journeys. 	<ul style="list-style-type: none"> • LTP4 commits the Council to start work to test the feasibility of a package of new comprehensive proposals to improve public transport and other sustainable modes of travel across the Borough.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • Whilst the sustainable travel and transport aims are generally supported, the Plan is based on aspirational hopes for the town and the transport aspects of the plan are not realistic. The proposals will be detrimental to the town as a whole in transport terms and the deliverability and soundness of the plan is questioned. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Plan through the Warrington Multi Modal Transport Model. It is accepted that the level of development proposed cannot be accommodated by the current transport network. A series of key transport infrastructure improvements are therefore required to support the proposed development allocations and the Plan as a whole.
<ul style="list-style-type: none"> • No mention of a much needed new crossing over the MSC. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. As such the Local Transport Plan identifies a specific work stream to begin the options assessment process for a new crossing within the first 5 years following its adoption.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • Agree in principle with the policy as it supports development in sustainable and accessible locations and seeks to improve the safety and efficiency of the transport network, tackle congestion, improve air 	<ul style="list-style-type: none"> • Comments duly noted.

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
quality, promote sustainable transport options, and reduce the need to travel by car and encouraging healthy lifestyles.	
<ul style="list-style-type: none"> • Support the provision of electric charging points, however the Council should work with appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements rather than imposing a blanket requirement on all developments. 	<ul style="list-style-type: none"> • Comments duly noted and this requirement will be subjected to negotiations through the planning application process.
<ul style="list-style-type: none"> • Whilst the potential benefits of futureproofing development are recognised, there can be no guarantee that some forms of new and emerging technology will ever reach the mass market. 	<ul style="list-style-type: none"> • Comments duly noted, however; policy does not commit to what types of emerging technologies may or may not come to the mass market, and therefore be a viable option in developments. It merely requires consideration to be given, and provided if suitable and viable.
<ul style="list-style-type: none"> • Do not object to the principles of this draft Policy. However, we would not support any policy requirements which threatened the viability and/or deliverability development. 	<ul style="list-style-type: none"> • Comments duly noted, with the Council's Local Plan viability Assessment concluding the policy requirements of the PSVLP will not threaten the viability of developments.
<ul style="list-style-type: none"> • The policy is long and overly detailed, would benefit from being divided into separate elements and has resulted in failure of the policy to deliver its actual requirements. Many of the points could be omitted as they relate to development control and /or good practice issues. It is also unclear why the requirement at 4, 5 and 6 have been included in this policy and not in a separate policy. 	<ul style="list-style-type: none"> • Policy INF1 is a 'Strategic Policy' to set out an overall strategy for sustainable travel and transport, therefore providing enough detail, certainty and clarity, so it is evident how a decision maker should react to all proposed transport and travel proposals.
Statutory Consultees	
<ul style="list-style-type: none"> • St Helens Council: Supports the policy in general and agrees there is a critical need to address the dependency on the private car and increase the use of public transport, walking and cycling. Would welcome greater emphasis on the provision of sustainable transport linkages between the urban areas of St Helens and the urban areas/employment sites in Warrington. 	<ul style="list-style-type: none"> • Agree. Policy wording in the updated PSVLP (2021) has been amended to provide for greater linkages.
<ul style="list-style-type: none"> • St Helens Council: Supports the emphasis on improving freight transport provision set out in Policy INF1. However, we request that this part of the 	<ul style="list-style-type: none"> • Comments noted, however; it is not considered necessary to make specific reference to Parkside in the neighbouring Borough.

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
Policy should refer to the opportunity presented to develop a Strategic Rail Freight Interchange at Parkside.	
<ul style="list-style-type: none"> • Highways England: Supports this policy to encourage modal shift to more sustainable modes of travel for local trips around Warrington and the wider urban area. We also welcome the inclusion of the recognition for schemes to mitigate impacts and to help improve the performance of the SRN. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Network Rail: Policies to support the retention of disused transport corridors for future transport use are broadly supported but will require discussion with the rail industry, as well as external funding, for rail based interventions to be progressed. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Network Rail: Policies related to improved freight transport provision should adequately consider the contribution that rail freight could make noting the need for any proposed intervention to work for the private sector (Policy INF1). 	<ul style="list-style-type: none"> • Comments duly noted.
Other	
<ul style="list-style-type: none"> • The Council needs to be more ambitious about decarbonising and truly face up to the problem caused by congestion on the Motorway and highway network and plan to reduce the demand for road based journeys. Therefore, there needs to be more walking, cycling and better connected public transport options. 	<ul style="list-style-type: none"> • The PSVLP (2021) policies to reduce car dependency will be complimented by the proposals set out in the Council's adopted Local Transport Plan 4, which covers sustainable travel including walking, cycling and public transport.
<ul style="list-style-type: none"> • Need other solution provided to the old Victorian Swing bridges to cross Waterways, which are already at capacity, and entirely in third party ownership. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the PSVLP (2021) Plan Period, it may be a requirement in the longer term. As such the Local Transport Plan identifies a specific work stream to begin the options assessment process for a new crossing within the first 5 years following its adoption.
<ul style="list-style-type: none"> • Poor transport strategy lacking in essential detail for such a large amount of growth, with the required infrastructure being aspirational, not planned, not confirmed, or costed. 	<ul style="list-style-type: none"> • The Council's Local Transport Plan 4 was progressed in parallel with the PSVLP (2019) to ensure both spatial strategies were integrated. The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
	<p>the Plan. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the Plan is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.</p>
<ul style="list-style-type: none"> Port Warrington will increase the use of the Ship Canal and result in more bridge swings, with no other options offered or planned for crossing the MSC. 	<ul style="list-style-type: none"> Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. However, the Port Warrington allocation has now been removed from the updated PSVLP (2021) as an allocation.
<ul style="list-style-type: none"> Does not take into account Warrington's unique travel and transport constraints; River, Canals, Motorways. 	<ul style="list-style-type: none"> The Council has assessed the level of development proposed in the Plan through the Warrington Multi Modal Transport model. The model represents the existing transport networks within Warrington and performance at present, taking into account constraints such as Rivers, Canals and the Motorway network, both internal and external to the Borough.
<ul style="list-style-type: none"> No thought as to how the extra thousands of vehicles and people will move about the Town, there will be more pressure on the roads (i.e. A49, A50, A56, M6, M56 & M62). 	<ul style="list-style-type: none"> The Council has assessed the level of development proposed in the Plan through the Warrington Multi Modal Transport model. The Council accepts that current infrastructure and services in south Warrington are not sufficient to support the level of development proposed. The proposed urban extensions are dependent on a wide range of improvements to existing infrastructure and the provision of new infrastructure to mitigate the impacts of development.
<ul style="list-style-type: none"> TPT: The needs of equestrians need to be noted at some point to ensure they are not being actively discriminated against. 	<ul style="list-style-type: none"> Comments duly noted, however; it is considered that this is not a requirement that needs to be addressed through a Local Plan Strategic Policy.

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The impact of the Western Link has not been properly assessed, and find it highly questionable that it will reduce traffic as stated; it is purely to open up land for development. 	<ul style="list-style-type: none"> The Western Link is the subject of a distinct and separate business case and assessment process, outside of the Local Plan process. However, it has been tested as a committed highway scheme through the Council's Multi Modal Transport Model (WMMTM). It is acknowledged that the Western Link will open up some land for development, however; it will also address wider issues of congestion across Warrington.
<ul style="list-style-type: none"> The Western Link is the result of a flawed argument, as a new fast section of road will just move the traffic and congestion to another bottleneck on the road network. 	<ul style="list-style-type: none"> The Western Link is the subject of a distinct and separate business case and assessment process, outside of the Local Plan process. However, it has been tested as a committed highway scheme through the Council's MMTM.
<ul style="list-style-type: none"> The Western Link will attract traffic from the tolled Runcorn/Widnes Bridge. 	<ul style="list-style-type: none"> The Western Link is the subject of a distinct and separate business case and assessment process, outside of the Local Plan process. However, it has been tested as a committed highway scheme through the Council's MMTM.
<ul style="list-style-type: none"> The Western Link will destroy Moore Nature Reserve, Morley Common and Sankey Valley Park and much wildlife habitat. 	<ul style="list-style-type: none"> There will need to be an agreed package of mitigation measures to offset any loss of habitat and wildlife that might occur as part of delivering the Western Link. This has been considered through the development of the Western Link and will be addressed and mitigation measures secured through the planning application process.
<ul style="list-style-type: none"> The safeguarded area for a replacement cantilever bridge should include areas for links into the existing or planned roads. 	<ul style="list-style-type: none"> The safeguarded land for the replacement Cantilever bridge has been rolled forward from the Local plan Core Strategy (2014) and is considered to be adequate for a replacement crossing, should one be needed in the future.
<ul style="list-style-type: none"> The policy should be amended to safeguard land which is designated for use by potential NPR facilities in Warrington. The Bridgefoot link plan in Figure 8 is likely to be incorrect if the WBQ LL route to Liverpool is chosen for NPR. 	<ul style="list-style-type: none"> There is currently no certainty where NPR rail will or will not be routed, therefore, no change proposed at the present time.

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • There is an estimate of £50 million for a new high level crossing of the Manchester Ship Canal, but no information on how this will be achieved whilst the canal continues to operate. 	<ul style="list-style-type: none"> • The continued operation of the MSC is not a consideration for the Local Plan process. Transport Modelling carried out to support the development of the PSVLP (2019) and the updated PSVLP (2021) has identified that a new road crossing of the ship canal is not critical to the delivery of the growth proposals set out in the Plan. • However, a number of issues will require further study and assessment over the first five years of the Local Plan and Local Transport Plan 4 (LTP4- 2019) to understand what further transport improvements may be required. This could include assessing the need for a further crossing over the Manchester Ship Canal.
<ul style="list-style-type: none"> • Need to reserve land within the Plan for a future Tram Depot, preferably close to the M6 at junction 20. 	<ul style="list-style-type: none"> • Given the Local Plan will need to be reviewed in 5 yearly cycles, it is not considered that enough detail exists at present to warrant the safeguarding of land for a Tram station.
<ul style="list-style-type: none"> • Need to reserve land within the Plan for a Park and Ride scheme on a route in the south of the Borough near to the A49. Suggest parcel A1 of the Garden Suburb Masterplan as a suitable site. 	<ul style="list-style-type: none"> • Given the Local Plan will need to be reviewed in 5 yearly cycles, it is not considered that enough detail exists at present to warrant the safeguarding of land for a Park and Ride scheme.
<ul style="list-style-type: none"> • Support for the protection of the disused TPT route. 	<ul style="list-style-type: none"> • Comment duly noted.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • Support proposals for the Western Link as it will improve congestion and open up brownfield land for development. 	<ul style="list-style-type: none"> • Comment duly noted.
<ul style="list-style-type: none"> • Question the ability of the Western Link to relieve congestion at Bridgefoot. 	<ul style="list-style-type: none"> • The Western Link is the subject of a distinct and separate business case and assessment process, outside of the Local Plan process. However, it has been tested as a committed highway scheme through the Council's MMTM.
<ul style="list-style-type: none"> • There will be a large amount of traffic coming off the Daresbury expressway onto the Western Link. 	<ul style="list-style-type: none"> • The Western Link is the subject of a distinct and separate business case and assessment process, outside of the Local Plan process. However, it has been tested as a committed highway scheme through the Council's MMTM.
<i>Landowner/Developer</i>	

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Support the safeguarding of land for a new or replacement high-level crossing over the MSC. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Support the recommended route for delivery of the Western Link. 	<ul style="list-style-type: none"> • Comments duly noted.
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
<i>Other</i>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •

Policy INF3 - Utilities and Telecommunications	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The existing Broadband speed is limited and Warrington should have high speed Broadband as standard, before any more growth. 	<ul style="list-style-type: none"> There are various Broadband providers across the Borough offering products to existing residents. Policy INF 3 Utilities & Telecommunications of the updated PSVLP (2021) makes provision for supporting the delivery of existing and emerging telecommunications (including Broadband) technology in new residential and employment developments. It is not a policy that will apply retrospectively in an attempt to upgrade existing services before any more growth will be delivered.
<ul style="list-style-type: none"> The Council should work with statutory undertakers to ensure high speed Broadband is available to not only residential properties, but also to local businesses and schools. 	<ul style="list-style-type: none"> Policy INF 3 Utilities & Telecommunications of the updated PSVLP requires developers to work with the Council and providers to ensure the necessary infrastructure (including Broadband) is provided as an integral part of improving connectivity to residents, businesses and to facilitate home working, when proposing new development.
<ul style="list-style-type: none"> Utilities are already at capacity. 	<ul style="list-style-type: none"> Policy INF 3 Utilities & Telecommunications of the updated PSVLP requires developers to work with the Council and providers to ensure the necessary infrastructure is provided as an integral part of planning for new development.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> It is not clear how the waste water treatment capacity will be increased to accommodate the needs of development proposed. 	<ul style="list-style-type: none"> Policy INF 3 Utilities & Telecommunications of the PSVLP requires developers to work with the Council and providers to ensure the necessary infrastructure is provided as an integral part of planning for new development.
<ul style="list-style-type: none"> The plan makes no reference to water supply which has been an issue in Warrington historically. 	<ul style="list-style-type: none"> Policy INF 3 Utilities & Telecommunications of the PSVLP requires developers to work with Statutory Undertakes and service providers to connect to existing utilities and deliver any additional infrastructure required to support development.
Landowner/Developer	
<ul style="list-style-type: none"> Agree with this policy, which will ensure development will deliver necessary physical infrastructure, whilst ensuring development does not 	<ul style="list-style-type: none"> Comments duly noted.

Policy INF3 - Utilities and Telecommunications	
Summary of Issues Raised	Response
<p>have an adverse impact upon the existing utilities and communications network.</p>	
<ul style="list-style-type: none"> • Support adequate provision of utilities and telecoms infrastructure however this is controlled by service providers and not developers. The Council should speak to relevant providers and not rely on developers. 	<ul style="list-style-type: none"> • The approach to engagement with service providers needs to include all partners including statutory providers, landowners and the Council, with the main onus being on developers to show they have engaged with the required service providers in a proactive and timely manner to ensure the delivery of the required infrastructure.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England: In view of NPPF the policy should be amended to refer to 'harm' in line with the NPPF. Bullet 9d should be amended to read: 'There is no unacceptable harm to residential amenity, the character and appearance of the area, the street scene, a heritage asset, pedestrian movement or the satisfactory functioning of the highway'. 	<ul style="list-style-type: none"> • Agree. Policy has been amended in the PSVLP (2021) to reflect comments.
<ul style="list-style-type: none"> • Cheshire East Council: There should be a proactive policy on the development of digital infrastructure. The digital policy should be a default of opt-in, with housing, employment land and infrastructure developers either being mandated to meet a digital infrastructure standard (the best outcome), or (at least) giving a justification for opting out. 	<ul style="list-style-type: none"> • Comments noted, however; it is considered that Policy INF 3 Utilities & Telecommunications of the PSVLP is a proactive policy for the delivery of infrastructure, including digital.
<ul style="list-style-type: none"> • United Utilities: Supports the inclusion of Policy INF 3 in the Local Plan, with some amendments to reflect United Utilities representation and the protection of United Utilities assets. 	<ul style="list-style-type: none"> • Agree. Policy has been amended in the PSVLP (2021) to reflect comments.
Other	
<ul style="list-style-type: none"> • Welcome the recognition in the Plan that future development proposals will continue to rely on gas and supports the Policy. It is expected that gas will continue to be used as part of the transition to a zero carbon economy and the use of onshore gas in the UK offers more certainty of supply and generates less impact on climate change than imported gas. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Support for part 6 of the policy. 	<ul style="list-style-type: none"> • Comments duly noted.

Policy INF4 - Community Facilities	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • There is no proper assessment of how much need for new community infrastructure will be required. 	<ul style="list-style-type: none"> • The Local Planning Authority in determining additional requirements works with those agencies – both internal Council services and external partners - who are responsible for delivery of services including health and education and who have expertise in assessing future needs. This is reflected in the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support new development.
<ul style="list-style-type: none"> • Concerns that there are no plans or in adequate plans in place through the policy to provide for additional community infrastructure required through the housing allocations identified through the Local Plan. 	<ul style="list-style-type: none"> • The Council in its allocation policies for housing sites has identified that developments will be expected to make a contribution to specified community infrastructure including schools, health and leisure facilities. There is also the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support new development.
<ul style="list-style-type: none"> • Respondents believe that the developers of housing sites will not contribute and assurances are needed that the community infrastructure will be built. 	<ul style="list-style-type: none"> • Guidance on viability and plan making from the Ministry and Housing, Communities and Local Government (MHC&LG) states viability is to be considered and tested at plan making stage with developers and land owners fully involved in assessing development against infrastructure needs and associated s106 contributions before the EIP. The Council has taken this approach and is in active discussions with developers and landowners and will have in place relevant agreements on contributions prior to EIP. If housing site allocations move forward to adoption and they have been considered viable then viability will not then be part of the planning application consideration unless the developer provides comprehensive evidence. To support its approach the Council has updated its Local Plan Viability Assessment and assessed the Plan's policies, including its affordable housing policy, and site allocations.
<ul style="list-style-type: none"> • Concerns that the present hospital is at capacity and that the Local Plan provides no details on the site and delivery of a potential new hospital especially in the context of population growth. 	<ul style="list-style-type: none"> • The Local Plan confirms that the Council and NHS have identified a requirement for a new hospital, however the location is not certain at this stage of the Plan. The Local Plan has responded to this need through

Policy INF4 - Community Facilities	
Summary of Issues Raised	Response
	the policy which will seek to allocate a suitable site, or redevelop the hospital on the existing site, based on the NHS Hospital Trust's preferred location following assessment of health care needs. The provision of new hospital services including their potential location are subject to special consultation procedures led by the Hospital Trust and Warrington CCG.
<ul style="list-style-type: none"> • The Council should demonstrate that there will be sufficient qualified medical staff for new health facilities. 	<ul style="list-style-type: none"> • The Local Plan is a land use document that can support the physical provision of facilities through land allocations. The staffing of facilities is not an issue for the Local Plan.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • Given the scale of housing development and resulting increased population, vague references to the provision of a new hospital are not adequate. This is especially the case as the existing site is a major regeneration opportunity. 	<ul style="list-style-type: none"> • The Local Plan confirms that the Council and NHS have identified a requirement for a new hospital, however the location is not certain at this stage of the Plan. The Local Plan has responded to this need through the policy which will seek to allocate a suitable site, or redevelop the hospital on the existing site, based on the NHS Hospital Trust's preferred location following assessment of health care needs. The provision of new hospital services including their potential location are subject to special consultation procedures led by the Hospital Trust and Warrington CCG.
<ul style="list-style-type: none"> • Concerns about the impact of new development on services. Investment in GP practices needs to be brought forward and not be delayed. 	<ul style="list-style-type: none"> • In responding to the need to deliver community facilities the Council is working with National Health Service providers on the level of contributions required and timing for facilities to be delivered to meet needs. Alongside these conversations discussions with land owners and developers are progressing on s106 payments and viability of sites to ensure funding is in place for facilities identified in a timely manner. This is in line with MHC&LG guidance on viability where it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • It is unclear what these community requirements are and they have not been factored into any viability schemes. 	<ul style="list-style-type: none"> • The Local Plan Viability Assessment takes into account the range of contributions that are required to support social, community and transport infrastructure. Where there are particular viability challenges

Policy INF4 - Community Facilities	
Summary of Issues Raised	Response
	for a specific site, then this can be assessed at the planning application stage.
<ul style="list-style-type: none"> • The references within this policy to Warrington Hospital are not necessary, beyond Point 3. 	<ul style="list-style-type: none"> • The Council is committed to working with the NHS and the Warrington and Halton Hospital Trust to deliver a new hospital. Point 4 allows for the Council to allocate a new site if required through a future review of the Local Plan. The wording of the policy has been developed in consultation with NHS partners.
Statutory Consultees	
<ul style="list-style-type: none"> • Warrington and NHS Foundation Trust appreciate the opportunities afforded to engage with the Local Plan and the support given to a new hospital. 	<ul style="list-style-type: none"> • Support noted
Other:	
<ul style="list-style-type: none"> • The Theatre Trust is supportive of the policy and particularly welcome clarification that it applies to cultural facilities such as theatres, arts venues and pubs. 	<ul style="list-style-type: none"> • Support noted

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Concerns over lack of detail on the infrastructure for major developments. 	<ul style="list-style-type: none"> The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the Plan as a whole and each of the allocation sites. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The allocation policies for major development schemes give detail on the infrastructure provision that will be required as part of the development. Further detail will be worked up as part of the Development Framework process required for the largest allocation sites. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the Plan is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.
<ul style="list-style-type: none"> Concerns that infrastructure will not be provided or not be provided in a timely manner, and that increased traffic, over-subscribed schools and health facilities will result. 	<ul style="list-style-type: none"> The Council in its allocation policies for housing sites has identified that developments will be expected to make a contribution to specified community infrastructure including schools, health and leisure facilities. Policies for major developments also contain specific wording that states residential development will not be permitted to commence until funding for the required community infrastructure is agreed. To support its approach the Council has updated its Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. Reference should also be made to the Infrastructure Delivery Plan (IDP) which has been developed with partners – including Council and external partner service providers to

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
	identify the community infrastructure required to support new development.
<ul style="list-style-type: none"> Concerns that the costs of infrastructure have not been estimated properly 	<ul style="list-style-type: none"> As part of the viability analysis that is undertaken for major allocations costings on transport infrastructure have been established and advice has been provided from capital programme public sector leads on building costs for schools, health centres and other community facilities. To support its approach the Council has updated its Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. Reference should also be made to the Infrastructure Delivery Plan (IDP) which has been developed with partners – including Council and external service providers - to identify the community infrastructure required to support new development.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> Concerns that the infrastructure has not been costed correctly 	<ul style="list-style-type: none"> As part of the viability analysis that is undertaken for major allocations costings on transport infrastructure have been established and advice has been provided from capital programme public sector leads on building costs for schools, health centres and other community facilities. To support its approach the Council has updated its Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. Reference should also be made to the Infrastructure Delivery Plan (IDP) which has been developed with partners – including Council and external service providers - to identify the community infrastructure required to support new development.
<ul style="list-style-type: none"> Concerns that strategic roads required to support the development proposed needs to be in place first and that no funding has been identified to meet costs. 	<ul style="list-style-type: none"> The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the Plan. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
	<p>Council is therefore confident that infrastructure can be delivered in a timely manner to support the development of the Plan.</p> <ul style="list-style-type: none"> • To ensure the timely delivery of infrastructure, the policy states in Part (3) that where new infrastructure is needed to support development, the infrastructure must be operational no later than the appropriate phase of development for which it is needed.
Landowner/Developer	
<ul style="list-style-type: none"> • General support and acknowledgement that in line with the NPPF planning obligation payments will be required and that these will be considered when appropriate at planning application stage. 	<ul style="list-style-type: none"> • Support noted • Policy INF5 in the updated Proposed Submission Version Local Plan has been amended to ensure sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought.
<ul style="list-style-type: none"> • A proposed that a modification to the policy wording at point 6. To ‘The Council will only consider the viability of development proposals <u>on allocated sites</u> at the planning application stage where...’ Based on the assumption that the policy only applies to un- allocated sites as at EIP viability will have been tested and contributions agreed. 	<ul style="list-style-type: none"> • Support noted • Policy INF5 in the updated Proposed Submission Version Local Plan has been amended to ensure sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought.
<ul style="list-style-type: none"> • Proposal at point 6: for a new sentence and points after bullet (b) to read; <u>‘Where provisions in the Infrastructure Development Plan have changed since the Local Plan viability appraisal to add, delete or modify requests relevant to a site allocation, the Council shall take such matters into consideration at planning application stage by either;</u> <u>c) Confirming the removal of the relevant planning obligation as part of the balance of benefits to that site allocation; or</u> 	<ul style="list-style-type: none"> • Policy INF5 in the updated Proposed Submission Version Local Plan has been amended to ensure sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought.

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
<p><i>d) Requesting a viability appraisal if challenged by the developer to demonstrate viability on the issues not considered or modified since the Local Plan's viability appraisal.'</i></p> <p>The proposal challenges the current wording which the respondent claims assumes that all requirements are validly sought and that requirements such as health where these may not materialise, it then argues that policy requires an assessment to be balanced to the 'full planning obligations' if the developer challenges the assumption.'</p>	
<ul style="list-style-type: none"> Proposed deletion of point 5 as this is too detailed for a Local Plan which should be broad brush and not detailed appraisal of sites. 	<ul style="list-style-type: none"> The NPPF at paragraph 34 (Development Contributions) states 'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education; health; transport; flood and water management; and green and digital infrastructure).'
<ul style="list-style-type: none"> Concerns that costs on infrastructure have not been assessed fully including major motorway works and that there is a billion pound plus funding gap 	<ul style="list-style-type: none"> The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the Plan. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the Plan is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.
<ul style="list-style-type: none"> The viability assessment does not confirm the amount of contribution 	<ul style="list-style-type: none"> To support its approach the Council has updated its Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. This includes assumptions around

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
	expected planning obligations as set out in the Viability Assessment Report. This is consistent with MHC&LG guidance on viability.
<ul style="list-style-type: none"> • CIL is not in place and clarification is required on the Council’s approach to CIL given the impact this may have on contribution and infrastructure required through the Local Plan 	<ul style="list-style-type: none"> • The supporting text states the Council may be introduce in due course, subject to Government proposals to review planning obligations through the forthcoming Planning Bill. The supporting text has been amended in the Updated PSVLP to remove the reference to limits on pooling of S106 which has now been removed by government.
Statutory Consultees	
<ul style="list-style-type: none"> • Highways England concerned: <ul style="list-style-type: none"> ○ that there is no accompanying transport evidence such as a base model to show highway impacts of proposals and that they would expect an interim assessment to demonstrate the phased impact of the draft Local Plan and interventions needed. ○ Infrastructure funding has not been confirmed. ○ More certainty over short term delivery of infrastructure is required. 	<ul style="list-style-type: none"> • To support the Council’s Local Plan, a transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development of the Strategic Road Network (SRN), and the Local Road Network (LRN). Additional modelling has been undertaken to address Highways England’s concerns. The Council continues to engage with Highways England through the Duty to Cooperate.
<ul style="list-style-type: none"> • Network Rail comments the Draft Local Plan should assess the impact of developments on level crossing to comply with NPPF guidance and mitigation through developer contribution should be allowed for where it is applicable. 	<ul style="list-style-type: none"> • There is no specific requirement within the NPPF for the Local Plan to address the impact of developments on level crossings. There is an obligation to assess the transport issues and development proposals with regard to the impact on the transport network. Where there are level crossings as part of the highway network this will be taken into consideration including any improvements or mitigation measure that may be required.
<ul style="list-style-type: none"> • Subject to an amendment of point 5 to read: ‘Historic environment including heritage at risk’ this policy is supported by Historic England. 	<ul style="list-style-type: none"> • Support noted. • The Policy in the updated Proposed Submission Version Local Plan has been updated to read ‘Historic environment including heritage at risk’.
Other	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •

Objective W5 - To secure high quality design which reinforces the character and local distinctiveness of Warrington's urban area, its countryside, its unique pattern of waterways and green spaces and its constituent settlements whilst protecting, enhancing and embracing the Borough's historic, cultural and built and natural assets.	
Summary of Issues Raised	Response
<i>Residents</i>	
• None.	•
<i>MP, Local Borough, Town or Parish Councillor</i>	
• None.	•
<i>Landowner/Developer</i>	
• None.	•
<i>Statutory Consultees</i>	
• Historic England support the objective.	• Support noted
<i>Other</i>	
• The CPRE supports the vision set out in the plan and this objective plus it agrees that Warrington's distinctiveness should be protected and this includes the rural character and natural environment and heritage via Conservation Areas through the Local Plan.	• Support noted

Policy DC1 - Warrington's Places	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The release of Green Belt around inset settlements runs contrary to the policy's intention at points 8-10 to protect the scale and function of settlements, boundaries and relationship to with main urban areas. 	<ul style="list-style-type: none"> Green Belt release in the outlying settlements is considered to be at a scale consistent with points 8 to 10 of the Policy. The policy is designed to protect the settlements and the Green Belt as amended by the draft Local Plan.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> Support in principle for the policy objectives as long it does not impact on viability. 	<ul style="list-style-type: none"> In chapter 12 of the NPPF (Achieving well-designed places), good design and place making is considered integral to the sustainable development of sites and therefore viability. The Council has updated its Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure that may be required to ensure it can be delivered in a timely manner.
<ul style="list-style-type: none"> Gulliver's World have suggested amending wording of the policy as follows: 18. The Council will continue to support the operation of Gulliver's World as a successful regional attraction, <u>including supporting the expansion and/or diversification of leisure uses connected with the existing theme park resort where compatible with other policies in this plan.</u> 19. The maintenance and improvement of existing facilities will be supported where this will not have a <i>materially</i> detrimental impact on surrounding residential areas and the local road network. 20. <u>Consideration will be given to the adoption of a Local Development Order to facilitate the phased delivery of an agreed programme of development consistent with the site's Allocation in policy OS10.</u> 	<ul style="list-style-type: none"> The Council does not considered there is any need to change the policy. Changing the wording would pre-determine the consideration of any application associated with the site and undermine the ability of the planning authority to consider all material considerations in connection with any application. This includes the need for sequential testing and consideration of environmental impact. The policy adequately takes into account any impacts on the surrounding area that might occur as the result of any proposals from Gulliver's World. There is no justification to put in place a Local Development Order or further site allocation in this instance. The policy supports the operation of Gulliver's World and the maintenance and improvement of existing facilities subject to these not having a detrimental impact on residential amenity and surrounding road networks
<ul style="list-style-type: none"> The definition for inner Warrington is unclear and the list of matters set out in point 2 are replicated from other policies. 	<ul style="list-style-type: none"> The definition is clear as the inner areas are defined by unparished areas and they are listed. The boundary is also shown on the Policies Map.

Policy DC1 - Warrington's Places	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The policy recognises the differences between areas and addresses key issues around the built environment; health and well-being; and deprivation. This approach is in line with paragraph 8 and 9 of the NPPF where sustainable development is supported by the guiding principles of economic, social and environmental objectives and should take account of local circumstances.
<ul style="list-style-type: none"> • The reference to the Masterplan is unnecessary and in the fullness of time will be made into an SPD or neighbourhood plan 	<ul style="list-style-type: none"> • The policy seeks to set out broad strategic parameters and intentions for the areas, this will support the development and the application detailed policies through other planning documentation. The guidance in the plan is positive and flexible in order to meet the development needs of the area and will be able to respond to change in line with paragraph 11 of the NPPF. • The policy has been modified in the Updated PSVLP to reference the Warrington Town Centre Supplementary Planning Document which the Council has now adopted as planning guidance. Reference in the policy and explanatory text is also made to the Town Centre Masterplan and the Central Six Regeneration Plan. These documents have been adopted by the Council as informal planning guidance and those seeking to develop proposals need to be aware of these documents.
<i>Statutory Consultees: Historic England</i>	
<ul style="list-style-type: none"> • Para 16 makes reference to the need for all proposals in the Walton Hall Estate to have regard to national and local policies relating to the historic environment, yet this does not apply to anywhere else in the places policy. This policy should be amended to enhance the approach to the historic environment and to ensure that it is conserved and enhanced in all places in Warrington and not just selective areas. 	<ul style="list-style-type: none"> • The policy is designed to articulate different priorities in locations across the borough and to identify key visitor attractions that the Council wishes to protect and enhance. Walton Hall Estate is an important asset and the policy promotes the potential that the estate presents whilst recognising its Green Belt and historic value. • Policy DC2 is referenced by DC1 in respect of Walton Hall which identifies an approach in point 1 to conserve and enhance the historic environment of all of Warrington.
<ul style="list-style-type: none"> • Historic England welcome the intention to ensure that proposals are not detrimental to the historic environment, the proposed wording suggests 	<ul style="list-style-type: none"> • Note the support.

Policy DC1 - Warrington's Places	
Summary of Issues Raised	Response
that it is only 'detrimental' that needs to be taken into account. Bullet 15(d) should be amended to read: "Conserve and enhance the historic environment"	<ul style="list-style-type: none"> • The policy wording has been modified in the Updated PSVLP in line with Historic England's suggestion.
Other	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •

Policy DC2 - Historic Environment	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Instead of the generic "aspirations" listed in the Local Plan, WBC should be more specific as to when and how they will preserve existing historic buildings. 	<ul style="list-style-type: none"> • It is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development. It confirms the Council will undertake proactive work to preserve and enhance heritage assets in the Borough over the Plan period and beyond.
<ul style="list-style-type: none"> • Although some parts of the policy has good intentions, the large scale development in the south of the Borough will not be protected by this policy. 	<ul style="list-style-type: none"> • It is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development. • For allocated sites, Heritage Impact Assessments have been prepared to identify heritage assets within the site and in close proximity that may be impacted by development, with specific mitigation measures identified and the mitigation requirements written in to allocation policies to protect them.
<ul style="list-style-type: none"> • The Bridgewater Canal contains many Listed Hump-Back Bridges in a state of poor repair. WBC should state how they will be maintained. 	<ul style="list-style-type: none"> • It is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • The proposals conflict with the concept of protecting the town's historic environment and heritage assets. The proposed allocations give rise to conflict with the character and appearance of a number of Conservation Areas and other designated heritage assets, and will therefore have a significant impact on heritage assets. 	<ul style="list-style-type: none"> • Alongside the relevant Heritage Impact Assessments, it is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development. • For allocated sites, Heritage Impact Assessments have been prepared to identify heritage assets within the site and in close proximity that may be impacted by development, with specific mitigation measures identified

Policy DC2 - Historic Environment	
Summary of Issues Raised	Response
	and the mitigation requirements written in to allocation policies to protect them.
<ul style="list-style-type: none"> • Kinknall Hall Farm, Moat & Barn should be included on the Local List. The area is shown on the 1849 OS Lancashire and Furness map. Its history needs recognition, and the whole site is of interest and needs archaeological investigation and protection. 	<ul style="list-style-type: none"> • The Council is committed to a review of its Local List through part 3a of policy DC2. This will be a separate process once the Local Plan has been adopted, where there will be an opportunity for people and organisations to submit details of assets they wish to be considered for inclusion on the Council's Local List.
Landowner/Developer	
<ul style="list-style-type: none"> • This policy as drafted is too lengthy, the requirements of the Policy are lost within the text and the Policy, as written, does not accord with the requirements of the NPPF and should be amended to reflect national policy. 	<ul style="list-style-type: none"> • Policy DC2 is a 'Strategic Policy' to set out an overall strategy for the pattern, scale and quality of development, therefore providing enough detail, certainty and clarity, so it is evident how a decision maker should react to development proposals. It has been drafted with the assistance of Historic England and is considered to be in line with the requirements of the NPPF.
<ul style="list-style-type: none"> • Support for general principles of this Policy. 	<ul style="list-style-type: none"> • Comments duly noted.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England: Welcome the inclusion of a policy for the Historic Environment in the Warrington Local Plan and the commitment to make suggested amendments to policies and supporting evidence base. 	<ul style="list-style-type: none"> • Agree to the Policy and evidence base amendments suggested.
Other	
<ul style="list-style-type: none"> • Cheshire Garden Trust: A number of historic designed landscapes entries are proposed for inclusion on the Council's Local List. 	<ul style="list-style-type: none"> • The Council is committed to a review of its Local List through part 3a of policy DC2. This will be a separate process once the Local Plan has been adopted, where there will be an opportunity for people and organisations to submit details of assets they wish to be considered for inclusion on the Council's Local List.
<ul style="list-style-type: none"> • Cheshire Garden Trust: Concerned that the definition of heritage assets is defined inadequately. There are currently no registered landscapes in Warrington, but there is always potential in the future. Amend wording in policy to reflect this. 	<ul style="list-style-type: none"> • Comments noted, however; material changes in circumstances, where they occur can be dealt with through the 5 yearly Local Plan review cycle. No proposed amendments to policy.

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Given the scope and extent of the “growth agenda” being promoted by the Council through the PSVLP, this cannot possibly be achieved through the aspirations of policy DC3 (Part 1). 	<ul style="list-style-type: none"> The development requirements have been revised and the Council are now only proposing to release 580ha of land from the Green Belt. In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council has however ensured that the allocation policies include specific provision to protect green infrastructure and provide mitigation and enhancements were necessary. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. In preparing the Plan, the Council has worked closely with statutory consultees including, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard.
<ul style="list-style-type: none"> The Draft Local Plan proposals to release 116ha of land from the Green Belt are inconsistent with the requirements of Part 6 of the Policy. 	<ul style="list-style-type: none"> The updated PSVLP is only proposing to release 580ha (5%) of land from the Green Belt as compared to 1,210ha (11%) previously. The site allocation policies are supported by ecological assessments. The NPPF requires biodiversity net gain and compensatory improvements to the accessibility and environment quality of land remaining in the Green Belt were the loss of Green Belt land is proposed. The site allocation policies (as proposed to be amended) contain criteria to achieve these requirements.
<ul style="list-style-type: none"> Man-made, “value engineered” alternatives will go no way to replacing these and our ecosystems and sustainability will suffer as a result. 	<ul style="list-style-type: none"> The Updated PSVLP is supported by a revised Habitat Regulations Assessment (2021) and ecological assessments. The HRA has been amended to address comments made by Natural England to ensure that there are no impacts on designated European sites or that any impacts can be mitigated.

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> It has not been demonstrated that the Policy will adequately protect woodland areas (including the Pewterspear woodland) and other sites. This makes the Plan unsound. 	<ul style="list-style-type: none"> Part 1 of the policy protects existing green infrastructure generally, whilst Part 5 of the policy protects green infrastructure in respect of specific development proposals. All of the woodland and greenspace around Pewterspear forms part of the green infrastructure network that is protected by this policy.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> There is support for the general intent of the policy (Bellway Homes/Richborough Estates). However, developers would not support any policy requirements that threatened the viability and/or deliverability development. 	<ul style="list-style-type: none"> Support noted. The Council has undertaken the preparation of a full revised Local Plan Viability Assessment (2021), which has reviewed all infrastructure requirements and costs for each of proposed allocations. Having undertaken this work the Council is confident that the necessary infrastructure is capable of being delivered. Nevertheless, the Council has modification Policy INF5 in the Updated PSVLP to ensure sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought.
<ul style="list-style-type: none"> The NPPF requires planning policies to “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”. It does not require net gains to be delivered on all development sites. The current policy wording sets a higher bar than national policy and no evidence has been provided to justify this approach (Peel Holdings Ltd). 	<ul style="list-style-type: none"> Paragraph 179(b) of the NPPF requires the Plan as a whole to achieve measurable net gains for biodiversity. It is considered proportionate to require all development to contribute equally to achieving this aim. The planning practice guidance indicates that planning conditions or obligations can, in appropriate circumstances, be used to require that a planning permission provides for works that will measurably increase biodiversity (Paragraph: 023 Reference ID: 8-023-20190721).
<ul style="list-style-type: none"> Apirose REI on behalf of The Park Royal Hotel (Stretton) object to the proposed allocation of land owned by the hotel as strategic green infrastructure. The proposed Policies Map indicates that this allocation is 	<ul style="list-style-type: none"> The land is designated as Outdoor sports private in the Open Space Audit (2015). The designation has been revised to just include the three tennis

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
<p>proposed under proposed Policies DC3 and DC5. This approach is unacceptable and there should be clarity on which Policy is being applied to meet the proposed allocations. There is no clarity on what the land in question can contribute to in the creation and maintenance of Green Infrastructure, Open Space, Outdoor Sport and Recreation. The land is simply too small to meet the definition of strategic green infrastructure nor is it listed within the areas of opportunity (DC3). In terms of DC5, the land cannot reasonably be considered to meet the needs of the Open Space Strategy. The allocation appears to be arbitrary. It is surrounded by existing built form and areas proposed for new residential development in the Garden Suburb Development Framework.</p>	<p>courts on the Policies Map. The designation will be updated in the next review of the Open Space Audit.</p>
<ul style="list-style-type: none"> IGas supports the opportunity to secure net gain in biodiversity. The onshore oil and gas industry has been actively engaged with Natural England (a statutory consultee for onshore oil and gas development), and UKOOG has submitted a response to their net-gain proposals. 	<ul style="list-style-type: none"> Support noted.
Statutory Consultees	
<ul style="list-style-type: none"> St Helens Council supports the references in the policy to Sankey Valley Park and St Helens Canal. Also support Part (3) of the policy which refers to wider programmes. Support the reference to Bold Forest Park in Part 3(b). This policy recognises the importance of a suitably joined up approach to managing Strategic Green Infrastructure. 	<ul style="list-style-type: none"> Support noted.
Other	
<ul style="list-style-type: none"> Moore Parish Council consider that the Plan will not be effective in delivering the Green Infrastructure that it seeks unless it makes clear reference to two key areas where the Plan proposes major development, namely: a) the right-of-way through the Warrington Waterfront allocation, and b) the Strategic Gap separating the South West Urban Extension and Halton Borough. The Strategic Gap offers an opportunity to realise the north-south Strategic Green Links shown as green arrows on the Key Diagram of the 2015 Core Strategy, connecting the Local 	<ul style="list-style-type: none"> The proposed allocations at the South West Urban Extension and the employment element of Warrington Waterfront have been removed from the updated PSVLP.

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
Nature Reserve on the north side of the Ship Canal with new landscaping south of the Ship Canal on the western edge of the South West Urban Extension.	
<ul style="list-style-type: none"> • The Mersey Forest is the local delivery framework for the Northern Forest. We work with other Community Forests and the Woodland Trust across the M62 corridor to coordinate our work at a trans-regional level. The Mersey Forest suggest a couple of amendments to the policy and supporting text for the purposes of clarification. In summary these are: <ul style="list-style-type: none"> ○ Ideally, the Local Plan should refer to The Mersey Forest where, now, Northern Forest is referenced. ○ Paragraph 8.3.16 of the supporting text should refer to the Mersey Forest Plan as being the local delivery framework for Northern Forest. 	<ul style="list-style-type: none"> • The wording of the policy (Part 3d) has been amended to reference the Mersey Forest and to the supporting text (paragraph 8.3.16), to make reference to the Mersey Forest Plan as being the local delivery framework for the Northern Forest.
<ul style="list-style-type: none"> • The Trans Pennine Trail consider that paragraphs 8.3.13 and 8.3.14 of the supporting text should make reference to safe, fully accessible walking and cycling routes or bridleways. 	<ul style="list-style-type: none"> • The goals listed in paragraph 8.3.13 of the supporting text have changed in the planning practice guidance (Refer to: Paragraph: 006 Reference ID: 8-006-20190721 (Revision date: 21 07 2019). The wording of the supporting text (paragraph 8.3.13) has been amended to make reference to the revised goals in the updated planning practice guidance. • The wording of the supporting text (paragraph 8.3.14) has been amended to make reference to bridleways, as well as recreational footpaths and cycleways.

Policy DC4 - Ecological Network	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Local residents consider that the Policy is not sound for the following reasons: The environmental and ecological impacts have not been properly assessed. A high level of environmental and ecological impact survey has not been included in the Plan. The plan seems to be totally out of touch with environmental concerns of the current time. In the council's presentation, there was no mention of net gain and no attempt to explain how the diversity and environmental value could be improved. The government has recently outlined a plan for net zero emissions by 2050 and the plan is at odds with this sentiment. The Biodiversity Strategy for England, Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services identifies "the protection and improvement of the natural environment as core objectives of the planning system". Many of the proposed allocations have value for current recreational use, farming, ecological and natural beauty. It is not low quality scrubland. The government's Natural Environment White Paper (The Natural Choice: Securing the Value of Nature), refers to the role of planning in protecting and improving the natural environment and facilitating coherent and resilient ecological networks that reflect the value of natural systems. The aims of the White Paper include halting biodiversity loss by 2020 supporting "healthy, functioning ecosystems". The proposals in the PSVLP are contrary to these recommendations. 	<ul style="list-style-type: none"> The Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on the environment (including climate change) through the Sustainability Appraisal process. A number of the Local Plan policies include specific provision to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change. The Council has subsequently published an addendum to the Sustainability Appraisal Report which gives specific consideration to the 2020 Heathrow Airport 3rd Runway High Court judgement. In addition, an assessment of the potential effects on near by European sites of nature conservation importance (Natura 200 sites) has been considered through the Habitats Regulations Assessment (HRA) process. The initial HRA has now been supplemented with an Updated HRA (August 2021) that takes account of concerns that NE raised in respect of two issues. Relevant policies in the Plan have been amended to take account of recommendations in the HRA.
<ul style="list-style-type: none"> The PSVLP will result the loss of part of Moore Nature Reserve and Green Belt which is the habitat to animals at risk of extinction. The PSVLP will have a detrimental effect on the local wildlife as it will destroy much of their habitat and destroy the biodiversity of the green open spaces unnecessarily. 	<ul style="list-style-type: none"> It should be noted that the Updated PSVLP is no longer proposing to allocate the South West Urban Extension or Port Warrington which would have resulted in the loss of part of Moore Nature Reserve. In addition, the South East Warrington Urban Extension is significantly smaller than the previous Garden Suburb allocation. As a consequence

Policy DC4 - Ecological Network	
Summary of Issues Raised	Response
	the amount of Green Belt that is now proposed to be released for development has reduced from 11% down to 5%.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • Question how Policy DC4 will achieve net gains in biodiversity with the amount of Green Belt to be lost. 	<ul style="list-style-type: none"> • Policy DC4 seeks to protect priority species and habitats on development sites and achieve a measurable net gain in biodiversity in line with section 40 of the Natural Environment and Rural Communities Act and the NPPF (2021 update) which indicates that in delivering sustainable development local authorities should enhance as well as protect biodiversity and natural habitats. The proposed allocation policies (MD1 to MD6 and OS1 to OS6) make reference to the need for the developments to deliver an increase in biodiversity in accordance with the requirements in Policy DC4 to ensure that the Plan as a whole will achieve net gains in biodiversity.
Landowner/Developer	
<ul style="list-style-type: none"> • Wallace Land Investments, IGas Energy PLC and Miller Homes support the general principles of the policy to consider the impact of development on ecology and to differentiate between the statutory and non-statutory designations and local and national designations. 	<ul style="list-style-type: none"> • Support noted.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust (CWT) object to this policy. It appears that the specific guidance as set out in the 2018 NPPF has not been followed and the policy should be re-draft; (a) so that it accurately reflects the guidance for habitats and biodiversity as set out in the 2018 NPPF rather than quoting the 2012 version, and (b) that it reflects the requirement for mandatory Net Gain for all developments in England as set out in the Chancellor’s Spring Statement 2019. A number of detailed modifications are suggested, in summary these are: 	<ul style="list-style-type: none"> • It is acknowledged that the policy does not now reflect the need to identify and pursue opportunities for securing measurable net gains for biodiversity, as expressed in paragraph 179(b) of the NPPF (2021). Part 1 of the policy has been updated to make reference to “measurable” net gains so as to accord with paragraph 179(b) of the NPPF (2021). • The environmental criteria referred to at paragraph 8 of the NPPF (2021) is one of 3 criteria applied when considering sustainable development. The criteria are not mutually exclusive nor does one have precedence, they need to be considered together so that there are net gains across all

Policy DC4 - Ecological Network	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> ○ Part 1 of the policy requires the words ‘where possible’ removing to demonstrate that the local authority is taking its responsibilities to the natural environment (and sustainable development) seriously; ○ Parts 4, 5, 6 and 7 of the policy should clearly set out that any proposals that could impact designated sites, wildlife corridors or protected/priority habitats and species must demonstrate how the mitigation hierarchy has been applied (to avoid, mitigate and as a last resort compensate). The mitigation hierarchy is the overarching principle of sustainable development in relation to the environment and should be clearly stated in this policy; ○ There is no ecological network map showing designated sites and ‘wildlife corridors and stepping stones that connect them’ (paragraph 174a NPPF). This exercise has not been undertaken for Warrington yet guidance is clearly set out in paragraph 174a of the NPPF. A location map for designated sites is not the same as an ecological network map. There is no reference to promoting the conservation, restoration and enhancement of priority habitats or priority species despite specific guidance in the NPPF (Protecting and Enhancing Biodiversity and Geodiversity paragraph 174b NPPF). ○ There is no specific guidance on the requirement to avoid development that impacts irreplaceable habitats (ie. ancient woodland, ancient trees) (paragraph 175 c NPPF). 	<p>3 criteria. This approach is supported through the Plan’s overall objectives and the supporting policies that follow on from these. Paragraph 8.4.11 of the supporting text sets out this approach and how the sustainability criteria should be met through the objectives and policy.</p> <ul style="list-style-type: none"> ● It is acknowledge there is no ecological map, however the Policies Map in line with the footnote identifies those areas that need to be protected by statute following the circular 06/2005. The guidance suggests the planning authorities can work with other authorities and partners to develop and deliver a strategic approach but the guidance also says that individual development proposals may give the opportunity to conserve and enhance biodiversity. ● Part 1 of the policy has been modified in the Updated PSVLP to refer to conservation, restoration and enhancement biodiversity and securing a measurable net gain in biodiversity. ● Paragraph 180 (c) of the NPPF (2021) indicates that development that impacts on such habitats should be refused unless there are wholly exceptional reasons and suitable compensation strategy exists. Part 7 of the policy has been modified in the Updated PSVLP to include this category of habitat (irreplaceable habitats).
<ul style="list-style-type: none"> ● CWT strongly disagrees with the final sentence of paragraph 8.4.7 of the supporting text, as it fails to address the requirement to achieve sustainable development. Whilst a pragmatic approach that ‘minimises delays and burdens’ may address the economic objectives of the planning system the approach must also address the social and 	<ul style="list-style-type: none"> ● Paragraph 8.4.9 of the supporting text in the Updated PSVLP makes clear that there is a need to addresses all of the objectives required to achieve sustainable development, including protecting the environment.

Policy DC4 - Ecological Network	
Summary of Issues Raised	Response
<p>environmental objectives. This is clearly set out in the introductory paragraphs of the 2018 NPPF (paragraph 8c). A caveat such as 'whilst protecting the environment' could be added to para 8.4.7 to bring it more into line with current ways of working and up-to-date guidance.</p>	
<ul style="list-style-type: none"> • CWT highlight that there is an outdated/incorrect reference to biodiversity net gains (paragraph 8.4.9) quoting the 2012 NPPF rather than the 2018 NPPF. 	<ul style="list-style-type: none"> • The supporting text reflects the revised objectives of sustainable development contained in paragraph 8 of the recently updated NPPF (2021).
<ul style="list-style-type: none"> • CWT advise that paragraph 8.4.13 of the supporting text provides a 'definition' for ecological networks however the 'definition' is actually a partial list of 'relevant evidence in identifying and mapping local ecological networks' taken from the Natural Environment White paper 2010. Six of the White paper pieces of evidence do not appear in the list provided by Warrington BC. To remove this and other evidence but to portray the partial list as a definition of ecological networks is misleading, a misrepresentation and totally unacceptable. A definition for ecological networks is given in the main text of the 2018 NPPF (paragraph 174a). Paragraph 8.4.13 should be amended to reflect the NPPF requirements. 	<ul style="list-style-type: none"> • Paragraph 8.4.15 of the supporting text includes the full list of components to be taken into account when identifying and mapping local ecological networks as specified in paragraph 011 Reference ID: 8-011-20190721 of the planning practice guidance (as revised on 21/07/2019).
<ul style="list-style-type: none"> • Ancient woodlands provide protection for fauna and flora and cannot afford to be lost and the fragmentation and loss should be prevented by the Local Plan. • There should be more explicit protection for ancient woodland and development where it destroys ancient woodland should be refused unless there are exceptional reasons and a suitable compensation strategy. 	<ul style="list-style-type: none"> • Paragraph 180 (c) of the NPPF (2021) indicates that development that impacts on such habitats should be refused unless there are wholly exceptional reasons and suitable compensation strategy exists. Part 7 of Policy DC4 has been modified in the Updated PSVLP (2021) to include this category of habitat (irreplaceable habitats).
<ul style="list-style-type: none"> • United Kingdom Onshore Oil & Gas (UKOOG) operators will work closely with the Council to identify suitable site locations in line with planning guidance and other regulatory requirements. 	<ul style="list-style-type: none"> • Support noted.

Policy DC5 - Open Space, Outdoor Sport and Recreation Provision	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The Proposals Map does not identify the land at the bottom of Doeford Close, Culcheth as protected public green space. It should be clearly marked as POS and protected for the local community. 	<ul style="list-style-type: none"> The land is not identified in the latest Open Space Audit (2015) as POS of any type. Whilst, the ownership of the land is uncertain it is acknowledged that it is used as informal amenity space and maintained by the Council. The Council will review this designation in a future update of the Open Space Audit and the Policies Map will be updated in a future review of the Plan if necessary. Existing open space, regardless of whether or not it is shown on the Policies Map is protected by Policy DC5, in accordance with paragraph 99 of the NPPF.
<ul style="list-style-type: none"> The Plan is unsound because it does not provide sufficient sports pitches and facilities to meet the requirements of the four proposed allocations in Lymm. 	<ul style="list-style-type: none"> The settlement allocation policies for Lymm (OS4 and OS5) require the developments to make a contribution to expanding and enhancing existing or planned built leisure facilities and playing pitch provision to serve the needs of the additional residents.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developers	
<ul style="list-style-type: none"> There is general support for the policy from developers (Wallace Land Investments/Peel Holdings Ltd/Taylor Wimpey/Bellway Homes). However, it is considered that the clarity of the policy could be enhanced in a number of instances: <ul style="list-style-type: none"> The amount of provision set out in the policy may not be viable in every circumstance. Taylor Wimpey, Bellway Homes and Richborough Estates consider that a clause should be added to allow for flexibility when viability is an issue; Peel Holdings Ltd (and Brooklyn Ltd) consider that the draft policy wording should clarify whether the provision of or contributions towards all forms of open space applies only to 'family dwellings' (i.e. those with two bedrooms or more) and that new development will only be expected to meet needs generated by the development which cannot be 	<ul style="list-style-type: none"> Support noted. The Council has undertaken the preparation of a full revised Local Plan Viability Assessment (2021), which has reviewed all infrastructure requirements and costs for each of proposed allocations. Having undertaken this work the Council is confident that the necessary infrastructure is capable of being delivered. Nevertheless, the Council has modification Policy INF5 in the Updated PSVLP to ensure sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought. It is acknowledged that the wording of Part 4 of the policy is ambiguous. It's intention is that the requirement to provide equipped play provision

Policy DC5 - Open Space, Outdoor Sport and Recreation Provision	
Summary of Issues Raised	Response
<p>accommodated within existing facilities in order to ensure that any planning obligations sought comply with statutory and national policy tests;</p> <ul style="list-style-type: none"> ○ Brooklyn Ltd consider that the policy is overly detailed and should be simplified, with much of the content being expressed in supporting text rather than policy. ○ The references to “indoor sport and recreational facilities” are unspecified and vague and should be clarified in the text; ○ It is unclear why sites of less than 40 dwellings do not have to provide open space provision etc, as this is typically based on minimum site size requirements (Anwyl Land Ltd & Millar Homes); and ○ Part 7b of the policy goes beyond the requirements of paragraph 97 of the Framework. These comments should be deleted from policy and the requirements of the NPPF paragraph 97 inserted (Brooklyn Ltd). 	<p>only applies to family accommodation but all forms of residential development will be expected to make provision or contributions to all other forms of POS and sports facilities. The Policy has been modified in the Updated PSVLP to clarify this point. Parts 4, 5 and 6 of the policy make it clear that development will only be expected to meet the needs not able to be accommodated by existing facilities.</p> <ul style="list-style-type: none"> ● The Policy is considered to contain the appropriate level of detail, subject to the minor modifications proposed. Part 6 of the policy refers to the Sports Facilities Strategic Needs Assessment (SFSNA) and the supporting text (paragraph 8.5.11) identifies the sports facilities types that are assessed in the SFSNA. However, the title, sub-titles and supporting text of the policy have been modified in the Updated PSVLP to clarify that sport provision relates to both indoor and outdoor sport. ● The threshold of 40 dwellings is appropriate having regard to the limited number of occupants that smaller developments would have and the limited size of on-site provision that would be justified to meet their needs. The supporting text has been modified in the Updated PSVLP to clarify why there is a 40 dwelling threshold. ● It is acknowledged that the wording of Part 7(b) of the policy goes beyond the requirements of the NPPF. In the Updated PSVLP, Part 7(b) of the Policy has been modified to refer to the exceptions listed in paragraph 99 of the NPPF (Revised 2021).
<ul style="list-style-type: none"> ● Anwyl Land Ltd welcomes the proposed flexibility to allow for off-site provision where on-site provision is not possible or appropriate. 	<ul style="list-style-type: none"> ● Support noted.
<ul style="list-style-type: none"> ● The evidence base must be kept up to date. 	<ul style="list-style-type: none"> ● Comment noted.
<ul style="list-style-type: none"> ● Homes England consider that the policies map should be modified to remove the open space allocation from within Peel Hall under draft Policy DC5. This land should instead remain identified as part of draft Policy MD4 only, as this will ensure the provision of any replacement playing pitches as part of the future development of the site. 	<ul style="list-style-type: none"> ● The policy only allocates the land for development in broad terms. Whilst it is acknowledged that through the planning application process there have been discussions regarding replacement playing pitch provision being provided elsewhere within the site the policy does not specify where that would be. Therefore, the Council consider that the

Policy DC5 - Open Space, Outdoor Sport and Recreation Provision	
Summary of Issues Raised	Response
	open space designation should remain until such time as the quantity and location of replacement provision is agreed and it has been provided.
<ul style="list-style-type: none"> • Apirose REI (owners Park Royal Hotel) object to the proposed allocation of land adjacent to the hotel as open space. It is too small to contribute to strategic green infrastructure (DC3) and cannot reasonable be considered to meet the needs of the Open Space Strategy (DC5). 	<ul style="list-style-type: none"> • The land is designated as a private outdoor sports facility in Open Space Audit (2015). However, only approximately 15% of the site is covered by tennis courts (three tarmac courts), the remainder of the site is a grass field. There is no obvious reason why the rest of the site was designated as outdoor sports provision. The Council will review this designation in a future update of the Open Space Audit and the Policies Map will be updated in a future review of the Plan if necessary.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • The Trans Pennine Trail consider that the policy could be strengthened by including 'accessible' facilities wherever possible to ensure everyone has equal opportunity of use. 	<ul style="list-style-type: none"> • Part 2 of the policy refers to securing convenient access to facilities.

Policy DC6 - Quality of Place	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Support for the principles of good design but the policy is not sufficient as the wording is ambiguous and open to interpretation 	<ul style="list-style-type: none"> • Policy DC6 has been revised in the Updated PSVLP (2021). These revisions have included reference to the recent updates to the NPPF (2021) on design codes and biodiversity and comments made by Cheshire Constabulary in respect of designing out crime. • In addition, the Policy now makes reference to the recently adopted Warrington Town Centre Supplementary Planning Guidance (SPD), which sets out the expectations of the Council for development proposals coming forward in the Town Centre. • These additional measures will help support the application of the principle of good design in the assessment of planning applications.
<ul style="list-style-type: none"> • No mention of disabled parking spaces 	<ul style="list-style-type: none"> • The provision of spaces for those who may have blue badges is set out in the Council's SPD on Parking Standards, this supports the application of relevant standards.
<ul style="list-style-type: none"> • The delivery of energy efficiency in dwellings should be linked to government targets on climate change. 	<ul style="list-style-type: none"> • The policy has been revised in the Updated PSVLP (2021) and linked to policy ENV7 (Renewable and Low Carbon Energy Development) which has also been revised to improve delivery of Government and the Council's targets on climate change.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • Density proposals are forwarded that support minimum housing density standard of 80 and 100dph within 800m of the centre and in the centre respectively, and in all other areas 50dph for houses and 70dph for apartments. This is based on a Transport for Greater Manchester 'Evidence Paper on Site Optimisation for Housing Policy – Critical Friend Review' (GMCA, 2016). This would then decrease demand for outer area land. 	<ul style="list-style-type: none"> • The development of housing policies and associated density guidance are specific to the housing needs, market, viability and locational characteristics of the area. Policy DEV1 has been revised in the Updated PSVLP (2021) to include housing densities for different areas of Warrington to ensure the effective development of land in varying locations. This policy also recognises that in setting higher densities for the town centre there is still a need to make sure that residential amenity and design standards are met this includes those that are set out in the Town Centre SPD. • Policy DEV1 encourages the use of high densities in appropriate locations for example on sites that are close to town or district centres or to public

Policy DC6 - Quality of Place	
Summary of Issues Raised	Response
	transport facilities. Densities of less than 30 dwellings per hectare (dph) are discouraged except where there is a legitimate planning reason for them, for example to ensure that development integrates successfully with the prevailing built form of the area or to protect the historic environment. The density of development on each allocated site should be at or above the minimum figures specified in the allocation policies.
Landowner/Developer	
<ul style="list-style-type: none"> • Support for policy but would be concerned if viability is adversely impacted by master plans and design codes. 	<ul style="list-style-type: none"> • Support noted • To support its approach the Council has updated its Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure and requirements that may be required.
<ul style="list-style-type: none"> • Much of the policy could be put into supporting text and the points at 1 (a) and (f) repeat each other. 	<ul style="list-style-type: none"> • The policy has been revised and remains in line with chapter 12 of the NPPF 'Achieving well-designed places', this includes a design vision so that applicants have as much certainty as possible. As stated in the policy the guidance will be strengthened by master plans and design codes for larger areas which will need to be agreed prior to development proceeding. • Point (a) deals with the wider design requirements of residential developments whilst point (f) is specific to detail on neighbouring occupants and land owners with regard to residential amenity and overlooking.
<ul style="list-style-type: none"> • The policy does not make it clear when a master plan may be required for a site and at what stage. 	<ul style="list-style-type: none"> • The policy should be read in conjunction with paragraph 132 of the NPPF which states that 'design quality should be considered throughout the evolution and assessment of individual proposals'. • The policy indicates that these will be considered for larger sites and areas particularly urban extensions. The requirement for the a master plan/development framework has been indicated in the land allocation policies, where necessary, and may be required as the result of pre-application discussions with the Council's Development Management Team as sites come forward for planning permission.

Policy DC6 - Quality of Place	
Summary of Issues Raised	Response
Statutory Consultees	
<ul style="list-style-type: none"> • Sport England comment that Active Design should be strengthened in part 3 of the policy. 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) includes a modified point to Policy DC6 to include an additional sub point 3(d) that requires development to meet the principles of 'Active Travel' and promote healthy active lifestyle, together with additional explanatory supporting text.
<ul style="list-style-type: none"> • Highways England support the policy 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Historic England support the policy subject to the amendment of the policy at 1(a) to read: 'Respect, sustain and make a positive contribution to local character and distinctiveness within the surrounding area, and where appropriate...' 	<ul style="list-style-type: none"> • Comment noted. The policy has been modified in the Updated PSVLP (2021) in accordance with Historic England's advice.
Other	
<ul style="list-style-type: none"> • UK Onshore Coal and Gas support point 4. But state that the use of coal and gas is not incompatible with the promotion of renewables. 	<ul style="list-style-type: none"> • Support and comment noted.
<ul style="list-style-type: none"> • Proposals put forward for detailed policies for the Garden Suburb which cover; design; layout; height; gardens; lighting; highways; energy efficiency; landscaping etc. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the Garden Suburb as seen in the previous PSVLP (2019). It has been replaced by the South East Warrington Urban Extension, which is significantly smaller. • The policy requires the preparation of a comprehensive Development Framework for whole allocation that will address these issues. The Framework will be subject to consultation with statutory consultees and the local community before being finalised, and will be a material consideration in the determination of planning applications.

Objective W6 - To minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington's air quality	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Request that the location of a community recycling and waste facility for Warrington Garden Suburb is identified in the plan 	<ul style="list-style-type: none"> The SEWUE policy (MD2) requires the preparation of a comprehensive Development Framework that accords with the site-specific requirements of the policy and wider Local Plan requirements. The location of the community recycling centre will be determined through this document. The Framework will be subject to consultation with statutory consultees and the local community before being finalised and will be a material consideration in the determination of planning applications across the Urban Extension and planning permissions will only be granted where they are consistent with the Development Framework.
<ul style="list-style-type: none"> The allocation of areas of Green Belt for development is not a prudent use of resources 	<ul style="list-style-type: none"> The majority of new development will be within the existing urban area and brownfield sites will contribute significantly to development sites with higher densities of development encouraged on these sites.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> Development and growth cannot make a contribution to improving Warrington's air quality, this must be achieved through efficiency and technology. The test for development is not to make the current conditions worse (as set out in policy ENV8). 	<ul style="list-style-type: none"> It is the purpose of the planning system to contribute to the achievement of sustainable development. Paragraph 7 of the NPPF indicates that "at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs". In addition paragraph 152 of the NPPF (Chapter 14) requires the planning system to "shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including

Objective W6 - To minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington's air quality	
Summary of Issues Raised	Response
	the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure".
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Others	
<ul style="list-style-type: none"> • IGas supports objective however, given the scale of future development provided by the Plan, there will be considerable increase in demand for energy resources. Notwithstanding the aims of the Plan to ensure development is energy efficient and resilient to climate change, onshore oil and gas production can make a significant contribution by delivering energy that is essential to the transition to a low carbon economy. 	<ul style="list-style-type: none"> • In line with the NPPF paragraph 152 the Plan is supporting a transition to a low carbon future in a changing climate. This includes through its policies reducing dependency on the car, supporting public transport, cycling and walking and identifying the need for investment in carbon neutral and zero infrastructure.
<ul style="list-style-type: none"> • The CPRE agrees that minimising the impact of development on the environment is vitally important. Community recycling centres are a welcomed idea and we urge for the reuse of previously developed land for this purpose. 	<ul style="list-style-type: none"> • Support and comment noted
<ul style="list-style-type: none"> • The Trans–Pennine Trail comment that designs for development should be fully accessible. This is the chance for Warrington to provide high standard accessible design specifications. 	<ul style="list-style-type: none"> • Part 2 of Policy INF1 Sustainable Travel and Transport specifically addresses the priority that the Council gives to the development of fully accessible sustainable transport routes and facilities such as bike parking. This is further supported in the allocations where the provision of green infrastructure is required to be accessible to all and accessible cycling and walking routes should be provided across green infrastructure routes connecting all existing and new development.

Policy ENV1 - Waste Management	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • General concern about the location of the proposed waste recycling centre in the south of the borough. In summary these are: <ul style="list-style-type: none"> ○ there is no indication of the exact location of the proposed new waste recycling centre in the south of the borough; ○ the replacement Sandy Lane Recycling Centre to serve the South of Warrington must not be located within Stretton village or any part of the Garden Suburb that is removed from the Green Belt. Ideally it should be within the existing Barleycastle Trading Estate. 	<ul style="list-style-type: none"> • The supporting text to Policy ENV1 (Paragraph 9.1.9) indicates that the needs of the south of the borough will be met by the replacement of the existing Community Recycling Centre (CRC) in Stockton Heath by a new facility in the proposed South East Warrington Urban Extension (SEWUE) allocation. The SEWUE policy (MD2) requires the allocation to be supported by a range of infrastructure, including a CRC. Policy ENV1 specifies suitable locations for new waste management facilities.
<ul style="list-style-type: none"> • The Waste Treatment Facility remains an outstanding issue for the Council. 	<ul style="list-style-type: none"> • It is acknowledged that this an outstanding issue that needs to be resolved. However, a Waste Transfer Station (WTS) is a facility that could be located in any general industrial/employment area. Hence, it is not considered necessary to specifically allocate a site for such a facility. If a site cannot be found from land within the Council's ownership then the Council will look to identify a site from existing or proposed employment allocations.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • Agree with the general principles underlying this policy for Waste Management 	<ul style="list-style-type: none"> • Support noted.
Statutory Consultees	
<ul style="list-style-type: none"> • St Helens Council have advised that the Merseyside & Halton Joint Waste Local Plan 2013 was prepared by the 5 Merseyside local authorities and Halton Council. It will be necessary for the needs assessment underpinning Policy ENV1 to adequately dovetail with the monitoring of the Joint Waste Local Plan. On-going liaison should take place to ensure any cross boundary waste issues affecting St Helens are adequately addressed in this policy. 	<ul style="list-style-type: none"> • Comments noted.

Policy ENV1 - Waste Management	
Summary of Issues Raised	Response
<i>Other</i>	
<ul style="list-style-type: none"> • Stretton NDP Group consider that the replacement Sandy Lane Recycling Centre to serve the South of Warrington must not be located within Stretton village or any part of the Garden Suburb that is removed from the Green Belt. Ideally it should be within the existing Barleycastle Trading Estate. 	<ul style="list-style-type: none"> • Comments noted in respect of Stretton Village. However, it is the Council's intention that a replacement of the existing Community Recycling Centre (CRC) in Stockton Heath should be provided in the proposed South East Warrington Urban Extension (SEWUE) allocation. The SEWUE policy (MD2) requires the allocation to be supported by a range of infrastructure, including a CRC. • Policy ENV1 specifies suitable locations for new waste management facilities. Any new facility would need to comply with these requirements.

Policy ENV2 - Flood Risk and Water Management	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Inaccurate information relating to flooding. Development on Greenfields has a negative impact on flooding and there is no evidence to suggest this has been taken in to account; for example, what about the local water table? 	<ul style="list-style-type: none"> • The PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. Along with the requirements of Policy ENV2 Flood Risk & Water Management, it is considered that the risks associated with flooding have been adequately dealt with.
<ul style="list-style-type: none"> • Local ponds should be retained and incorporated within development. Run-off facilities should be maintained and continue to provide habitats for local wildlife. 	<ul style="list-style-type: none"> • Agree and where possible this will be the case.
<ul style="list-style-type: none"> • Properly managed green spaces can act as critical flood management systems by providing space for managed flooding, protecting built up areas, in times when the climate is changing. 	<ul style="list-style-type: none"> • Agree and where possible this will be the case.
<ul style="list-style-type: none"> • Policy fails to consider the needs of the Town in relation to surface water drainage and water management in general, in all areas, including those not located in high flood risk areas. 	<ul style="list-style-type: none"> • The PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. Along with the requirements of Policy ENV2 Flood Risk & Water Management, it is considered that the risks associated with flood risk, either in a high risk or low risk area have been adequately dealt with.
<ul style="list-style-type: none"> • Policy fails to deliver the stated Objectives of the Plan. 	<ul style="list-style-type: none"> • It is considered that Policy ENV2 Flood Risk & Water Management is adequate, in line with national policy and will deliver the Objectives of the PSVLP.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • Generally supportive of this Policy. However, elements of it such as (4) (i.e. that no development should take place within 8m of the top of a water course etc) should be a matter of detail on a site-by-site basis discussed in conjunction with the LLFA rather than stipulated through Policy. 	<ul style="list-style-type: none"> • Support noted. Given the wording of the Policy, it is considered there is flexibility within Policy ENV2 to allow this approach through consultation with the Environment Agency and the LLFA at the planning application stage.

Policy ENV2 - Flood Risk and Water Management	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Support the objectives and intentions of Policy ENV2 which seeks to focus new development within areas at the lowest risk of flooding and does not exacerbate the risk of flooding elsewhere. This aligns with national policy. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Whilst the intention of policy element 14 is supported in principle, it will be important to ensure that the early phases of housing delivery on large sites are not unduly constrained or expected to carry the costs associated with site-wide infrastructure, especially where the wider site is in multiple ownerships. 	<ul style="list-style-type: none"> • Comments noted. The whole Local Plan has been subject to a Viability Assessment to ensure the required infrastructure can be delivered without the burden falling on to one large site.
Statutory Consultees	
<ul style="list-style-type: none"> • Environment Agency: Consider that flood risk is adequately covered in Policy ENV2 and are supportive of policy. However, we are of the view that the document does not put a strong enough emphasis on the rivers in the area. These should be seen as a real positive asset to Warrington and an emphasis on protecting and improving these watercourses should be made. 	<ul style="list-style-type: none"> • Comments duly noted and it is considered that the policy requirements adequately address the points raised.
<ul style="list-style-type: none"> • Environment Agency: Little information regarding the Water Framework Directive, it is only mentioned in passing in paragraph 8.4.10 and 8.4.12. Under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations), public bodies must have regard to the relevant RBMP in exercising their functions which affect a river basin district. 	<ul style="list-style-type: none"> • Comments duly noted and it is considered that the policy requirements adequately address the points raised.
<ul style="list-style-type: none"> • United Utilities: On the whole Supportive of this policy. 	<ul style="list-style-type: none"> • Comments duly noted as is the continued collaborative working with UU through the Local Plan process.
Other	
<ul style="list-style-type: none"> • This is not a suitable Policy given the proposed levels of growth and detailed amendments requested to the Policy. 	<ul style="list-style-type: none"> • This is a strategic policy that is in line with the requirements of national policy and is considered adequate to protect the whole Borough from the risk of flooding and assist in water management. No changes proposed.

Policy ENV3 - Safeguarding of Mineral Resources	
Summary of Issues Raised	Response
Residents	
• None.	•
MP, Local Borough, Town or Parish Councillor	
• None.	•
Landowner/Developer	
<ul style="list-style-type: none"> • General support for policy and principle of safeguarding mineral resources. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • The policy should make clear that the allocation at Peel Hall and the surrounding built up areas are not safeguarded from development. At present it is not clear. 	<ul style="list-style-type: none"> • Part 3(f) of Policy ENV3 refers to the list of non-mineral development exempt from the requirements of safeguarding in Table 8 (page 143). This makes clear that development within the urban area is excluded from the requirements to consider the MSA on sites of less than 5ha. This is consistent with the advice in paragraph: 004 (Reference ID: 27-004-20140306) of the planning practice guidance which indicates that it can be appropriate to safeguard mineral resources in designated areas and urban areas, as safeguarding of minerals beneath large regeneration projects in brownfield land areas can enable suitable use of the mineral and the stabilisation of any potentially unstable land before any non-minerals development takes place. The supporting text (paragraphs 9.3.14 to 9.3.16) explains that it is recognised that much of the resource has already been built on and sterilised and that identifying the full extent of resources available and requiring prior extraction may place onerous requirements on developers and therefore, the policy only requires those proposed developments on sites of greater than 5ha within the urban area to undertake a mineral resource assessment. • An additional requirement (Part 33) has been added to the Natural Environment section of Policy MD4 (Peel Hall) in the updated PSVLP, to require a Mineral Resource Assessment to be undertaken to determine if there is any viable resource worth extracting prior to the development of the site and if any viable resource is identified to outline how it will be extracted.

Policy ENV3 - Safeguarding of Mineral Resources	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Paragraph 9.3.1 of the supporting text needs to reflect the wider scope of minerals found in the Borough (and should include hydrocarbons). 	<ul style="list-style-type: none"> • Paragraph 3.9.7 acknowledges the there are hydrocarbons present in the borough.
<ul style="list-style-type: none"> • It is not clear which brick clay workings are safeguarded through Policy ENV3. This is because none of the sites identified as having planning permission in Paragraph 9.4.3 of the Local Plan are within the Minerals Safeguarding Areas shown on the Local Plan Proposed Submission Version Proposals Map. The reasoned justification to Policy ENV3 states existing clay workings near Rixton will be safeguarded. Peel Land and Property do not consider the safeguarding of the existing clay workings at Rixton sites alone to be an approach which is appropriate or consistent with national policy. The quantity of clay required by the Cheshire Brickmakers Factory is not detailed in the key evidence documents and as such, it is unknown whether the safeguarded sites do provide the requisite reserve for brick clay (at least 25 years). 	<ul style="list-style-type: none"> • Figs 14 and 15 have been modified, in the updated PSVLP, to delete the clay pits and sandstone quarry from Fig 15 and include them on Fig 14 along with the appropriate safeguarding areas/buffers in order to make clear that the resource is safeguarded under Parts 1 to 3 of the policy. In addition, the Polices Map has been modified to include the clay and sandstone MSA buffers and the existing key minerals infrastructure identified in Fig.15.
<ul style="list-style-type: none"> • Site investigation undertaken by Peel Land and Property at Rixton New Hall have confirmed that there are clay reserves present. The clay has been tested and sample bricks fired confirming that the clay is of high quality and a desirable colour for brick making. As such, clay from the site is likely to be in high demand to service a range of building projects. Peel Land and Property believe such reserves should be safeguarded for future extraction. This would address the concerns in respect of the soundness of the Plan and consistency with national policy as set out above. 	<ul style="list-style-type: none"> • The NPPF requires MPA's to plan for a steady and adequate supply of minerals. The planning practice guidance encourages MPA's to designate Specific Sites, Preferred Areas, Areas of Search in order to achieve this. However, paragraph: 009 (Ref ID: 27-009-20140306) indicates that the better the quality of data available to MPA's, better the prospect of a site being designated as a specific site. The site is located in an area covered by the sand and gravel MSA designation. However, no specific data has been provided in respect of the quantities and quality of clay reserve to justify a specific site designation.
<ul style="list-style-type: none"> • Whilst it is noted that safeguarded areas do not (understandably) include PEDL licence areas it is important and should be made clear that the policy would equally apply to any future exploration site. 	<ul style="list-style-type: none"> • In the updated PSVLP, Part 5 of the policy and the supporting text at paragraph 9.3.13 have been modified to clarify that above ground infrastructure associated with energy minerals exploration and production will be subject to the same safeguarding requirements as other minerals infrastructure.
Statutory Consultees	

Policy ENV3 - Safeguarding of Mineral Resources	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The Coal Authority supports the policy, which identifies MSAs and sets out criteria against which proposals for development in MSAs will be assessed. Test of soundness: The Plan has been prepared positively, is justified, effective and consistent with the NPPF. 	<ul style="list-style-type: none"> • Support noted.
Other	
<ul style="list-style-type: none"> • The Mineral Products Association and United Kingdom Onshore Oil & Gas) support the principle of safeguarding mineral resources. However a number of amendments to the policy and its supporting text are suggested. In summary these are: <ul style="list-style-type: none"> ○ The policy would benefit from reference to the <i>Agent of Change Principle</i> to ensure Mineral sites and infrastructure as shown in Figure 15 are not needlessly sterilised. No safeguarding buffer is given to Minerals infrastructure in the urban area, which reinforces the need to include the Agent of Change Principle. ○ Part 4 of the policy should be amended to include PEDL licence areas within the 250m safeguarding buffer. ○ Paragraph 9.3.1 of the supporting text needs to reflect the wider scope of minerals found in the Borough (and should include crushed rock and Sandstone). ○ Paragraph 9.4.2 states no new sites for Mineral extraction have been identified, therefore, 'Areas of Search'(AoS), over and above MSAs need to be identified. 	<ul style="list-style-type: none"> • In the updated PSVLP, the wording of Part 4 of the policy has been amended to make reference to the buffer zones specified in Table 9 and the supporting text has been amended at paragraph 9.3.17 to refer to the requirements of paragraph 210(c) of the NPPF. • Petroleum Exploration and Development Licences (PEDL) allow for the pursuit of a range of oil and gas activities, subject to planning permission and other consents. The majority of Warrington is covered by a total of five PEDL (Numbers: 145, 193, 253, 273, 276). It is not proposed to safeguard hydrocarbons because the surface development associated with extraction is flexible regarding its location. This is consistent with the advice in paragraph: 108 (Reference ID: 27-108-20140306) of the planning practice guidance. In the updated PSVLP, Part 5 of the policy and the associated supporting text at paragraph 9.3.13, have been modified to clarify that above ground infrastructure associated with energy minerals exploration and production will be subject to the same safeguarding requirements as other minerals infrastructure. • Paragraph 9.3.1 only identifies the broad groups of minerals found in the borough. Sandstone is only known to exist in a few isolated outcrops and is not identified as a mineral resource by the BGS. Hence, it has not been included as one of the broad categories listed in paragraph 9.3.1. In the updated PSVLP, the supporting text has been modified at paragraph 9.3.1 to explain the existence of isolated pockets of sandstone and clay. • The Council commissioned a Mineral Resource Study as part of the evidence base for the emerging Local Plan. As part of this study a call for sites exercise was undertaken with the minerals industry, however, no

Policy ENV3 - Safeguarding of Mineral Resources

Summary of Issues Raised	Response
	<p>sites were nominated for consideration as part of the Local Plan review. Hence, the consultants reviewed the potential sites/areas identified within the previous MRS from 2009 and contacting those operators and landowners who had nominated sites previously to establish whether they wished the sites to be considered within the Local Plan review. Only one landowner responded requesting their site be considered as part of this latest review. This site was assessed and found to be unsuitable for designation as a AoS due to; the lack of information regarding the level of mineral resource available; a number of non-statutory designation within and surrounding the proposed AoS; the presence of a Major Accident Hazard Pipeline on part of the site, all of which would impact on the potential of the site to be used for mineral extraction.</p>

Policy ENV4 - Primary Extraction of Minerals	
Summary of Issues Raised	Response
Residents	
• None.	•
MP, Local Borough, Town or Parish Councillor	
• None.	•
Landowner/Developer	
• None.	•
Statutory Consultees	
<ul style="list-style-type: none"> Cheshire East Council consider that whilst Policy ENV4 and its accompanying justification provide a generally permissive approach to the determination of proposals for mineral extraction, the Council considers that a more proactive approach may be required in respect of aggregate sand and gravel if the Council is to better provide for meeting a more sustainable proportion of its own needs. Whilst a call for sites exercise was undertaken in 2016 and yielded no suitable sites, no attempt seems to have been made to understand why the fairly significant deposits of sand and gravel identified by BGS in the Borough have not come forward and whether the Council can do anything proactively to assist operators in bringing forward proposals. 	<ul style="list-style-type: none"> The Council commissioned a Mineral Resource Study as part of the evidence base for the emerging Local Plan. As part of this study a call for sites exercise was undertaken with the minerals industry, however, no sites were nominated for consideration as part of the Local Plan review. Hence, the consultants reviewed the potential sites/areas identified within the previous MRA from 2009 and contacting those operators and landowners who had nominated sites previously to establish whether they wish the sites to be considered within the Local Plan review. Only one landowner responded requesting their site be considered as part of this latest review. This site was assessed and found to be unsuitable for designation as a AoS due to; the lack of information regarding the level of mineral resource available; a number of non-statutory designation within and surrounding the proposed AoS; the presence of a Major Accident Hazard Pipeline on part of the site, all of which would impact on the potential of the site to be used for mineral extraction.
<ul style="list-style-type: none"> The Plan acknowledges that the minerals sub-region now has less than 7 years supply of aggregate, a position which has deteriorated further in the latest 2019 draft LAA. This sub-region has plans for significant growth and yet there are currently no proposals for new sand and gravel sites in the whole sub-region. The assumption being made seems to be that sand and gravel requirements will be met mostly through a continuing and intensifying reliance on imports. It is not clear to what extent this assumption has been tested and that the required levels of 	<ul style="list-style-type: none"> WBC participates in the NW Aggregates Working Party and subscribes to the national Managed Aggregate Supply System through market monitoring and production of an annual Local Aggregates Assessment (LAA), in line with the requirements of the NPPF. Matters relating to mineral reserves and land banks are monitored and reported annually at this sub-regional level through the LAA. The Association of Greater Manchester Authorities (AGMA), the Merseyside authorities, including Halton (working through Merseyside Environmental

Policy ENV4 - Primary Extraction of Minerals	
Summary of Issues Raised	Response
<p>aggregate can in fact be provided by the market over the plan period, so that the levels of growth identified in the Plan can be delivered.</p> <ul style="list-style-type: none"> Cheshire East Council is currently preparing a draft Minerals and Waste DPD and is aware that it will need to make further provision to ensure that a steady and adequate supply of aggregate sand and gravel can be achieved if its regional apportionment or average sales figures are to be met. As no DtC discussions to date have identified the need for the Council to provide for higher levels of aggregate provision to meet the growth plans of neighbouring authorities, including Warrington, it is assumed that this will be provided by the market from elsewhere. 	<p>Advisory Service (MEAS)), and the unitary authority of Warrington (known as the 'sub-region') are continuing to work together to produced a combined LAA and to address the shortfall in it's 7 year aggregate land bank for sand and gravel.</p> <ul style="list-style-type: none"> The Council will also continue to work with the neighbouring authorities of Cheshire East and Cheshire West & Chester to ensure that Warrington's unmet needs, as part of the aggregate and shortage in the wider AGMA/Merseyside sub-region, do not place an individual burden on the two authorities and the wider Cheshire sub-region.
<p>Other (1):</p> <ul style="list-style-type: none"> The Mineral Products Association (MPA) consider that whilst reference is made to the Local Aggregate Assessment, the Plan should look closer at the minerals provision required to meet future development aspirations highlighted within the plan. The Planning Practice Guidance is clear on this. The MPA consider that there is clearly a shortfall for sand and gravel provision as identified in the plan and it is not clear from either the Local Plan or the LAA how future aggregate provision will be achieved to meet the inevitable increases in demand arising from the Council's development aspirations and other regional projects such as those associated with HS2 and the Northern Powerhouse. As such, this element of the plan as considered to be unsound. 	<ul style="list-style-type: none"> The Council are working with it's partner authorities in the sub-region and the NAWWP to address the regional and national issues facing mineral provision and the need for update guidance from Government. It is acknowledged that there is a shortfall of sand and gravel provision when measured against the Sub-regional apportionment targets. The Council are working with it's partner authorities in the sub-region to address the shortfall identified in the latest LAA.

Policy ENV5 - Energy Minerals	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • Local MP considers that fracking is bad for the environment and would displace genuinely low carbon energy production. The Council should follow in the footsteps of Greater Manchester by effectively banning fracking and including policy wording to create a 'presumption against drilling for shale gas'. 	<ul style="list-style-type: none"> • The NPPF (paragraph 209(b)) indicates that mineral planning authorities should plan positively for the three phases of on-shore oil and gas development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided.
Landowner/Developer	
<ul style="list-style-type: none"> • Support for the inclusion of this policy, which sets out criteria against which proposals for energy minerals development will be assessed (INEOS Upstream Ltd). However, it is considered that certain elements could be revised and simplified to provide one policy to deal oil and gas. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Part 2(b) of the Policy needs to be amended to make clear what is meant by 'appropriate' baseline monitoring and what information would be required. 	<ul style="list-style-type: none"> • In the updated PSVLP, the requirement in Part 2(b) of the policy has been deleted (See response to UKOOG below).
<ul style="list-style-type: none"> • Support Part 2(c) of the Policy. However, it should be noted that below the ground activities are governed by the Health and Safety Executive and the Oil and Gas Authority as part of their ongoing regulatory remits and therefore local authorities are only required to look at surface issues. 	<ul style="list-style-type: none"> • Support and comment noted.
<ul style="list-style-type: none"> • Object to Part 3(a) of the Policy. It is unclear what a 'full appraisal programme' actually means. The appraisal of a licence which may include a "field" or more than one field is a regulatory function of the Oil and Gas Authority through their licencing process. There needs to be flexibility to allow an operator to plan its own appraisal programme in the knowledge that any impacts arising will be fully addressed by the implementation of development planning policy. 	<ul style="list-style-type: none"> • The policy is not requiring the appraisal programme to be approved it merely seeking confirmation that an appraisal programme has been completed. There is no need to amend the policy.
<ul style="list-style-type: none"> • Support Part 3(b) of the Policy. However, the terms 'most suitable' and 'technical factors' need to be clarified. The geology first nature of exploration, appraisal and production should be recognised. 	<ul style="list-style-type: none"> • Support noted. The term "most suitable" is qualified in the policy. There is no need to amend the policy.

Policy ENV5 - Energy Minerals	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Object to Part 3(c) of the Policy. The development of a gas field is a matter for the Oil and Gas Authority. Applications should be treated on their own merits. The scale of future development may not be known as the results of one well may determine the viability of future developments or otherwise. 	<ul style="list-style-type: none"> • It is appropriate to consider the cumulative impacts of gas field development on the landscape in much the same way as the national planning practice guidance advocates for wind turbines. It is also considered that this assessment should relate to oil field development as well. Although it is accepted that clarification is required as to what cumulative impacts need to be assessed. • In the updated PSVLP Part 3(c) of the policy has been modified to clarify that the assessment of cumulative impacts should relate to the cumulative landscape and visual impacts of both oil and gas field development.
<ul style="list-style-type: none"> • Support Part 3(d) of the Policy. However, the local plan should also have regard to the further Written Ministerial Statement of 23 May 2019 referred to. The reference in policy ENV8 to air and water quality is unnecessary. These are matters covered by the Environment Agency. Planning policy should not seek to take over matters covered by other regulatory bodies. 	<ul style="list-style-type: none"> • Support and comment noted. • Whilst it is acknowledged that some issues are the responsibility of other regulatory bodies the planning practice guidance makes clear that they may be relevant to mineral planning authorities in specific circumstances (Paragraph: 112 Reference ID: 27-112-20140306). For example, the Environment Agency has responsibility for ensuring that risk to groundwater is appropriately identified and mitigated. Where an Environmental Statement is required, mineral planning authorities can and do play a role in preventing pollution of the water environment from hydrocarbon extraction, principally through controlling the methods of site construction and operation, robustness of storage facilities, and in tackling surface water drainage issues.
<ul style="list-style-type: none"> • Revised policy approach suggested. 	<ul style="list-style-type: none"> • The Council do not consider that the suggested policy approach is sufficiently detailed.
Statutory Consultees	
<ul style="list-style-type: none"> • The Coal Authority supports for the inclusion of this policy, which sets out criteria against which proposals for energy minerals development should be assessed. 	<ul style="list-style-type: none"> • Support noted.
Other	

Policy ENV5 - Energy Minerals	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • United Kingdom Onshore Oil & Gas (UKOOG) supports Part 2 of the policy in general. However, it should be noted that sites are chosen based on where the minerals are found and the plan must recognise this distinction. It is also worthy of note that it is not always possible for developments to accord with all policies in a local plan and weight must be attached having regard to the degree of inconsistency and mitigation proposed. In circumstances such as these, greater weight should be attached where development proposals are in the national interest. 	<ul style="list-style-type: none"> • Support and comments noted.
<ul style="list-style-type: none"> • UKOOG object to Part 2(a) of the Policy. The Policy requires demonstration that a proposal accords with ‘all other policies of the Local Plan.....’. This is too onerous as potential sites are identified based on geology and where the minerals are found. 	<ul style="list-style-type: none"> • The policy is qualified by the words “environmental, public amenity and sustainable transport”. It does not require proposals to accord with all policies in the Local Plan.
<ul style="list-style-type: none"> • UKOOG object to Part 2(b) of the Policy. Baseline monitoring of sites prior to commencement is already a requirement of the environmental permitting system, regulated by the Environment Agency. In accord with PPG paragraph 113 the local authority should leave this to the Environment Agency as part of their regulatory remit. This paragraph should therefore be removed or amended to reflect the EA role. A remit for various types of monitoring also lies within other regulators, this should be made clear. 	<ul style="list-style-type: none"> • It is acknowledged that Paragraph: 112 Reference ID: 27-112-20140306 of the planning practice guidance advises that there are a number of issues which are covered by other regulatory regimes and mineral planning authorities should assume that these regimes will operate effectively. Whilst these issues may be put before mineral planning authorities, they should not need to carry out their own assessment as they can rely on the assessment of other regulatory bodies. • Therefore, it is considered that Part 2(a) of the policy is sufficient to address any relevant issues that the MPA are required to consider by Paragraph: 110 Reference ID: 27-110-20140306 of the planning practice guidance. • In the updated PSVLP Part 2(b) of the policy has been modified to delete the requirement.
<ul style="list-style-type: none"> • UKOOG supports Part 2(c) of the policy. It should be noted that below the ground activities are governed by the Health and Safety Executive and the Oil and Gas Authority as part of their ongoing regulatory remits and therefore local authorities are only required to look at surface issues. 	<ul style="list-style-type: none"> • Support and comment noted.

Policy ENV5 - Energy Minerals	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • UKOOG supports Part 3(b) of the policy. However, the terms ‘most suitable’ and ‘technical factors’ need to be clarified and the Policy must recognise that oil and gas can only be extracted where it is found. UKOOG suggest that the words ‘most suitable’ are removed. 	<ul style="list-style-type: none"> • Support noted. The term “most suitable” is qualified in the policy. There is no need to amend the policy.
<ul style="list-style-type: none"> • UKOOG objects to Part 3(c) of the Policy. Applications for onshore oil and gas should be treated on their own merits. 	<ul style="list-style-type: none"> • It is appropriate to consider the cumulative impacts of gas field development on the landscape in much the same way as the national planning practice guidance advocates for wind turbines. It is also considered that this assessment should relate to oil field development as well. Although it is accepted that clarification is required as to what cumulative impacts need to be assessed. • Part 3(c) of the policy has been modified in the PSVLP to clarify that the assessment of cumulative impacts should relate to the cumulative landscape and visual impacts of both oil and gas field development.

Policy ENV6 - Restoration and Aftercare of Mineral and Waste Sites	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • IGas Energy PLC supports the Policy and criterion providing they only apply to planning matters and do not overlap or interfere with the responsibility of other regulators. 	<ul style="list-style-type: none"> • Support and comment noted.
Statutory Consultees	
<ul style="list-style-type: none"> • The Coal Authority supports the inclusion of this policy, which requires submission of appropriate proposals for restoration and aftercare of mineral sites. Test of soundness: The Plan has been prepared positively, is justified, effective and consistent to NPPF. 	<ul style="list-style-type: none"> • Support noted.
Other	
<ul style="list-style-type: none"> • United Kingdom Onshore Oil & Gas (UKOOG) supports the Policy and criterion providing they only apply to planning matters and do not overlap or interfere with the responsibility of other regulators. 	<ul style="list-style-type: none"> • Support and comment noted.
<ul style="list-style-type: none"> • The Mersey Forest suggest that the Local Plan should refer to <i>The Mersey Forest</i> where, now, Northern Forest is referenced. Para - 9.6.8 – 3rd line could add – “in Warrington, the local Community Forest is The Mersey Forest.” 	<ul style="list-style-type: none"> • The proposed wording of the supporting text has been updated to refer to the Mersey Forest as the local Community Forest.

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • This policy is insufficient to meet the Climate and Environmental Emergency. Zero carbon targets should be met sooner than 2030 (preferably 2025). The Council are doing little to meet this target, whilst LTP4 should promote clean air zones and charging points near workplaces along with car schemes to complement the regeneration of the centre of Warrington. A Park and Ride scheme was requested during consultation but has not been included in the Plan. The Council needs to take a proactive approach in meeting national carbon reduction targets and clean air zones. The DLP and LTP4 need to be re-written to support net zero carbon by 2030. • This is a plan that is the opposite of carbon neutral. The whole plan is designed around significantly increased car and lorry use. The massive increase in lorry transport from the planned industrial estate will damage further the air quality of those living near the motorways and arterial routes. Climate change guidelines should be incorporated into the Plan as an emergency to prevent pollution from HGVs. LTP4 cleaner fuels initiative should be implemented. 	<ul style="list-style-type: none"> • It is not purpose of the Local Plan to meet the requirements of the “climate and environmental emergency “ and achieve zero carbon targets in isolation. Nevertheless, the Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on Climate Change through the Sustainability Appraisal process. A number of the Local Plan policies include specific provision to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change. The Council has subsequently published an addendum to the Sustainability Appraisal Report which gives specific consideration to the 2020 Heathrow Airport 3rd Runway High Court judgement. • The proposed employment allocations and urban extensions in the Plan are all dependent on infrastructure improvements to the Strategic and Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts. The Local Plan Air Quality Modelling Report concludes that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. In addition, the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. Most importantly in the context of the Local Plan, planning applications will be closely scrutinised to ensure that air quality has been appropriately considered, to ensure that opportunities to improve air quality are not missed and to ensure that developments that could have a significant detrimental impact are not approved.
<ul style="list-style-type: none"> • There is a lack of commitment to climate change and a lack of encouragement for micro-generation. All developments should be 	<ul style="list-style-type: none"> • This is exactly what the policy seeks to achieve. Parts 1 and 2 support the development of renewable and low carbon energy infrastructure, with

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
required to maximise use of low carbon technologies, accommodate solar power and hot water installations to contribute to renewable and low carbon efficiency.	Part 2 giving positive weight to initiatives which are community-led or provide direct benefits to local communities. Whilst parts 3-6 of the policy will require all development to seek to minimise carbon emissions through the use of renewable and low carbon infrastructure (subject to the amendments outline below).
<ul style="list-style-type: none"> • All new dwellings should be “zero-energy” “green” houses, rather than the timid target of “at least 10% of their energy needs from renewable and/or other low carbon energy source(s)” (ENV7, bullet 4). 	<ul style="list-style-type: none"> • Whilst, the NPPF requires planning polices to help increase the use and supply of renewable and low carbon energy and heat (paragraphs 152 to 157), there is no requirement to make all dwellings to be zero carbon. It is the purpose of the Building Regulations to regulate the energy efficiency of buildings.
<ul style="list-style-type: none"> • A strategic district heating network does not make sense for the proposed Garden Suburb development. 	<ul style="list-style-type: none"> • Paragraph 155 of the NPPF requires Local Plans to seek to increase the use and supply of renewable and low carbon energy and heat, by providing a positive strategy for energy from these sources and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. Policy ENV7 is consistent with these requirements. In any event, it only requires the strategic housing allocations to establish or connect to a decentralised energy network if it is feasible and viable to do so.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • There is support for the general intent of the policy. In particular, Taylor Wimpey supports parts 1 to 3 of this policy insofar as they seek to support renewable and low carbon energy infrastructure. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • There are objections to applying a blanket requirement to all major development. It is considered to be unjustified as the Deregulation Act (2015) included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than building regulation energy efficiency standards for new homes. Part 4 of the Policy should be removed. 	<ul style="list-style-type: none"> • It should be noted that the policy has been modified in the updated PSVLP. Whilst, the requirement in Part 4 of the policy still applies to all major developments, it allows schemes the option of using renewable and/or low carbon energy sources to provide a proportion of their energy needs or reducing their carbon emission rates by improved energy efficiency measures in the building fabric.

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Developers do not support any policy requirements that would threaten the viability and/or deliverability development. A number of developers have expressed concerned that the cost of providing infrastructure required by the Policy has not been factored into the Viability Assessment and the implications of its provision cannot therefore be properly assessed. 	<ul style="list-style-type: none"> • The Council has undertaken the preparation of a full revised Local Plan Viability Assessment (2021), which has reviewed all infrastructure requirements and costs for each of proposed allocations. The Council's updated Viability Assessment has indicated that all the allocations are viable whilst making provision to establish a decentralised energy network and / or 10% renewable energy. Having undertaken this work the Council is confident that the necessary infrastructure is capable of being delivered.
<ul style="list-style-type: none"> • Peel Holdings Ltd is concerned that the draft policy wording does not meet current technical thinking and recent announcements from the Government (including in relation to the Future Homes Standard) because it promotes the use of decentralised energy systems (typically gas fired) in strategic housing developments which will add significant cost to development and – more importantly – does not meet the Government's target for all new homes to be 'gas free' by 2025. 	<ul style="list-style-type: none"> • It is considered that there is sufficient flexibility in the policy as worded to allow different types of energy systems. There is no specific policy requirement for a decentralised energy system to be gas fired.
<ul style="list-style-type: none"> • Bellway Homes object to the wording of Parts 6(a) and 6(b) of the Policy because in some circumstances, it will not be possible for development to connect to or provide its own decentralised energy network or alternatively provide the requirements set out in 6(a) and 6(b). 	<ul style="list-style-type: none"> • Part 6 (Part 5 in the updated PSVLP) of policy ENV7 only requires development to connect to or establish its own decentralised energy network if it is feasible and viable to do so.
<ul style="list-style-type: none"> • Point 1 of this policy is meaningless, it adds nothing as a presumption, and therefore should be deleted or the policy wording amended (Brooklyn Ltd). 	<ul style="list-style-type: none"> • Paragraph 155 of the NPPF requires Local Plans to seek to increase the use and supply of renewable and low carbon energy and heat, by providing a positive strategy for energy from these sources. Part 1 of policy ENV7 is consistent with this requirement and provides a basis for assessing free-standing independent infrastructure.
<ul style="list-style-type: none"> • The Council's approach to this policy is inconsistent and should not distinguish between non-allocated and allocated sites. 	<ul style="list-style-type: none"> • It should be noted that the policy has been modified in the Updated PSVLP (2021). However, it still makes a distinction between non-allocated and allocated sites. • The Council's Renewable Energy Study (The Liverpool City Region - Renewable Energy Capacity Study, 2010) identified that as the Building Regulations are progressively tightened, developers will be dependent

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
	upon having access to decentralised energy networks in order to achieve the low carbon targets and these are generally more viable and feasible in larger developments. Hence, the requirement for the allocated sites to seek to establish or connect to an existing decentralised energy network if it is of sufficient scale and it is viable to do so.
<ul style="list-style-type: none"> • This policy states that site allocations should maximise opportunities for the use of decentralised energy systems with provision made in terms of connectivity. It is not clear how it is intended that developers should interpret this requirement and how it would work in practice. Majornet Ltd & Bellway Homes are not aware of anything within the evidence base clarifying how this policy is intended to work and what is meant by the requirement to connect to decentralised energy systems. 	<ul style="list-style-type: none"> • Paragraph 155 of the NPPF requires Local Plans to seek to increase the use and supply of renewable and low carbon energy and heat, by providing a positive strategy for energy from these sources and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. Policy ENV7 is consistent with these requirements. It only requires the strategic housing allocations to establish or connect to a decentralised energy network if it is <u>feasible and viable</u> to do so.
<ul style="list-style-type: none"> • The Policy as drafted conflicts with the wording of Policy DC6 which seeks to encourage the use of renewable/low carbon technology as appropriate. There is no alignment between the two policies, the latter of which stipulates the requirement to provide 10% of all energy needs from renewable resources. Consistency between both policies is required. As drafted the policy is conflicting and cannot be found sound. 	<ul style="list-style-type: none"> • The wording of Part 4(c) of Policy DC6 has been modified to cross reference to the requirements of Policy ENV7 in the Updated PSVLP (2021).
Statutory Consultees	
<ul style="list-style-type: none"> • Cheshire East suggest that the policy and/or its justification could usefully make reference to battery storage facilities as an example of a low carbon technology which captures energy, usually from renewable energy sources, for discharge to the national grid when required. This saves energy for use when needed which would otherwise be lost. 	<ul style="list-style-type: none"> • The policy wording has been modified to make reference storage infrastructure in the Updated PSVLP (2021).
Other	
<ul style="list-style-type: none"> • Stretton NDP Group considers that all community buildings (however small) and large logistics distribution centres should be constructed to accommodate solar power and/or hot water installations so that they can contribute to renewable and low carbon efficiency. 	<ul style="list-style-type: none"> • It would be unduly restrictive to require these specific types of development to utilise solar power and/or hot water infrastructure as a means of reducing carbon emissions. For example, most large warehousing uses do not have a demand for large amounts of

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
	heating/hot water and not all have large power requirements either. In many cases the requirement is for cooling rather than heating/hot water or power. Hence, the Council's policy is designed to give developments the flexibility to minimise carbon emission by the most appropriate method dependent upon the end user requirements.

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Concerns that development proposals in the draft Local Plan for Warrington will worsen air quality and that the policy is inadequate and unsupportable. 	<ul style="list-style-type: none"> The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP concluded that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. The Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the Updated PSVLP (2021) is proposing a lower level of development. The existing report is therefore considered to assess a 'worst case' scenario. Updated air quality modelling has however informed the Updated Habitats Regulation Assessment (2021). The proposed employment allocations and urban extensions in the Plan are all dependent on infrastructure improvements to the Strategic and Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts Most importantly in the context of the Local Plan, planning applications will be closely scrutinised to ensure that air quality has been appropriately considered, to ensure that opportunities to improve air quality are not missed and to ensure that developments that could have a significant detrimental impact are not approve.
<ul style="list-style-type: none"> The policy and draft Local Plan do not go far enough in putting in place mitigation to lessen air pollution (including what is acceptable and what is not). 	<ul style="list-style-type: none"> As above.
MP, Local Borough, Town or Parish Councillor	

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Concerns that development proposals in the draft Local Plan for Warrington will worsen air quality and that the policy is inadequate and unsupportable. 	<ul style="list-style-type: none"> As above.
Landowner/Developer	
<ul style="list-style-type: none"> Alteration of wording at point 8 with additional 'any loss of the Borough's best and most versatile agricultural land will be clearly justified and/or minimised' to bring policy in line with the NPPF. 	<ul style="list-style-type: none"> It is unclear where this reference is made in the NPPF. Guidance on the development of agricultural land is found in the Natural Environment section of the planning practice guidance. This states that 'Planning policies and decisions should take account of the economic and other benefits of the best and most versatile agricultural land'. Also, in line with schedule 4 paragraph (y) of the Development Management Procedure Order (2015) states that Natural England is a Statutory Consultee where planning applications for seeking permission for large scale development on the best and most versatile land that is not allocated in the development plan. The guidance from Natural England also states that the guidance aim is 'to protect the best and most versatile agricultural land and soils in England from significant, inappropriate or unsustainable development proposals'. In line with this guidance, advice taken on the proposed allocations from Natural England and the Sustainability Appraisal supporting the Plan the wording at point 8 is not considered to be in contradiction to the NPPF or the applicable planning guidance.
<ul style="list-style-type: none"> Policy is at odds with the development of town centre put forward in the plan and duplicates other policies such as DC6, no need to do this. 	<ul style="list-style-type: none"> The comment appears to represent that development of the town centre cannot meet with the requirements of the policy which seek to ensure there is not harm or impact on air quality, land quality, water quality the ambient environment including noise, smells etc. The government guidance on achieving sustainable development contained in Chapter 2 of the NPPF states clearly that the purpose of the planning system is to contribute to the achievement of sustainable development through the environmental objectives set out at paragraph 8. This includes minimising waste and pollution.

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Policy DC6 is concerned with the quality and design requirements of new development. Whilst, Policy ENV8 is primarily concerned with overall environmental amenity and mitigating the impact development can have on specific environmental receptors and concerns. The policies have overlap but should be seen as complementary.
Statutory Consultees	
<ul style="list-style-type: none"> • Natural England’s response to the Reg 19 consultation of the PSVLP identified that the Habitats Regulations Assessment (HRA) identified potential effects in relation to air quality impacts on Manchester Mosses Special Areas of Conservation (SAC) and that further detail was needed to clarify the scale of impacts and certainty that mitigation measures are deliverable and would remove impacts. As part of the assessment of the amended HRA a need for amendments to Policy ENV8 and the supporting text were identified as follows: <ul style="list-style-type: none"> ○ Amend wording of Part 4 of the Policy to require all new development that is of a scale to need a Transport Assessment to be undertaken (thresholds specified in the Transport SPD, as maybe amended) to also devise a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles. This would avoid placing an undue burden on small sites and convey benefits to the SAC as well as air quality more broadly (Amended HRA dated April 2020 – Para 4.33). ○ Add additional wording to the supporting text to highlight that air pollution is an area of the plan that will require further work to inform a future review. It is suggested that wording is added to the supporting text after section 9.8.6 highlighting that <i>environmental impacts as a result of air pollution is an element of the plan where there is limited evidence but one which requires LPAs to work together on wider solutions. The</i> 	<ul style="list-style-type: none"> • The wording of Part 4 of Policy ENV8 has been amended in the Updated PSVLP (2021). The Updated HRA (2021) acknowledges that this is the case. • The Updated PSVLP (2021) is supported by an Air Quality Modelling Report undertaken for the previous PSVLP (2019), which concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
<p><i>LPA is committed to continued engagement on this issue and it will make any necessary steps required to support wider initiatives that may come forward prior to a review of the plan, this includes working with neighbouring authorities and combined authorities in the assessment of in-combination effects (NE email dated 4th Dec 2019).</i></p>	<p>implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised.</p>
<p>Other</p> <ul style="list-style-type: none"> • I Gas support the policy but state that air and water quality are for the Environment Agency. 	<ul style="list-style-type: none"> • It is acknowledged that that Air and Water quality are a responsibility of the Environment Agency. The policy meets with the Planning Guidance Notes in Air Quality and; Water Supply, Wastewater and Water Quality that require Local Plans to have positive policies in place to support a range of air quality and water issues, this includes positive planning for water infrastructure and measures to protect against polluting development or where necessary improve water quality and air quality.

Policy MD1 - Waterfront (including Port Warrington)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The Plan is not sound as it proposes to destroy a significant part of Moore Nature Reserve (MNR), which consists of 200 acres of woodland, meadows, lakes and ponds. This will have a devastating effect on local wildlife, reduce biodiversity and increase air pollution. • Any mitigation suggested by the addition of 'new' open space allowing access to the now-closed Arpley tip will not produce an equivalent environment. • This is an area of significant ecological diversity with resident red list species such as Lesser Spotted Woodpeckers and Willow Tits, as well as Bitterns. There is also a wet woodland environment which is an increasingly rare UK Biodiversity Action Plan Priority Habitat and cannot easily be recreated. Proposals to provide mitigation through Arpley landfill sites conversion into a Country Park cannot guarantee successful re-colonisation of the area by current species. A sanitised park will not replace the loss of ponds, areas of wild flowers and wildlife habitat. • Paragraph 10.1.11 of the supporting text will be impossible to achieve with regard to wet woodland and the lesser spotted woodpecker. Even if could be achieved it would take over 50 years for the created woodland to be suitable for Lesser Spotted Woodpeckers and so the development could not take place until the habitat has been created and was functioning. • The loss of MNR will spoil a popular local nature amenity for generations. The ability to access and enjoy green space is an amenity in itself and the loss of such a significant amount of green space will be detrimental to all residents. 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront, which would have resulted in the loss of part of Moore Nature Reserve. • In addition to the loss of part of Moore Nature Reserve, the Council has significant concerns around its potential impacts on the Western Link Road and whether these impacts can be mitigated. • It should be noted that there are uncertainties over Warrington's longer term employment land supply, beyond the end of the Plan Period. As such, the Council is committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised. • Any future of Warrington's employment land needs will be included as part of a wider review of the Local Plan and will be subject to extensive consultation.
<ul style="list-style-type: none"> • Active local authority support for industrial development on nature reserves sets a precedent which will almost certainly lead to other sites being compromised in future. 	<ul style="list-style-type: none"> • The Council has re-assessed all of the potential employment sites submitted for consideration as part of the Local Plan process to take into account the most up to date evidence and market considerations. This

Policy MD1 - Waterfront (including Port Warrington)	
Summary of Issues Raised	Response
	<p>includes assessment as part of the updated EDNA and then assessment in accordance with the Council's site selection process, taking into account the Plan's objectives, and SA/SEA.</p> <ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront. In addition to the loss of part of Moore Nature Reserve, the Council has significant concerns around its potential impact on the Western Link Road and whether these impacts can be mitigated. • It should be noted that there are uncertainties over Warrington's longer term employment land supply, beyond the end of the Plan Period. As such, the Council is committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised. • Any future of Warrington's employment land needs will be included as part of a wider review of the Local Plan and will be subject to extensive consultation.
<ul style="list-style-type: none"> • The proposed development is on a massive scale that would impact on the countryside and surrounding villages of Walton and Moore. This would significantly adversely impact and destroy the true character and uniqueness of these villages. 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront, which would have resulted in significant encroachment into the Green Belt. The Warrington Waterfront allocation is now predominantly confined to land within the existing urban area.
<ul style="list-style-type: none"> • The proposals would be contrary to the Local Plan vision for a vibrant town centre surrounded by countryside and distinct settlements. 	<ul style="list-style-type: none"> • The residential elements of the Waterfront allocation will increase the residential population with easy access to the Town Centre, supporting its regeneration. It will also reduce pressure on the need to release Green Belt elsewhere in the Borough.

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Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront, which would have resulted in the loss of Green Belt and part of Moore Nature Reserve.
<ul style="list-style-type: none"> • The likelihood of the UK leaving the EU on disadvantageous terms now seems to be increasing, making a recession likely, which will negatively impact all businesses, especially haulage and distribution. The plan is not deliverable and is unsound because any business case made for Port Warrington, should now be re-assessed. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2021) using data which post-dates the EU Brexit referendum. The Council no longer considers the previous scale of jobs growth to be realistic. The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations. • The Council has re-assessed all of the potential employment sites submitted for consideration as part of the Local Plan process to take into account the most up to date evidence and market considerations. This includes assessment as part of the updated EDNA and then assessment in accordance with the Council's site selection process, taking into account the Plan's objectives, and SA/SEA. • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront. In addition to the loss of part of Moore Nature Reserve, the Council has significant concerns around its potential impact on the Western Link Road and whether these impacts can be mitigated. • It should be noted that there are uncertainties over Warrington's longer term employment land supply, beyond the end of the Plan Period. As such, the Council is committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.

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	<ul style="list-style-type: none"> Any future of Warrington's employment land needs will be included as part of a wider review of the Local Plan and will be subject to extensive consultation.
<ul style="list-style-type: none"> The proposed amount of housing would strain already struggling infrastructure, such as roads, public services, social care, education, GP surgeries. 	<ul style="list-style-type: none"> The Council in its allocation policies for housing sites has identified that developments will be expected to make a contribution to specified community infrastructure including schools, health and leisure facilities. The policies for the major developments also contain specific wording that states residential development will not be permitted to commence until funding for the required community infrastructure is in place. It should be noted that the Council has undertaken additional master planning work in the town centre and surrounding area to confirm the housing land capacity and this is now incorporated into the SHLAA (2020). As part of this work the residential capacity of the Waterfront allocation has been reduced from 2,000 to around 1,335 new homes in the Updated PSVLP (2021).
<ul style="list-style-type: none"> The public transport availability and accessibility in South Warrington is below that required for the current population and needs to be expanded and improved to reduce the current vehicle numbers on the road. Access to the rail network in south Warrington is non-existent and people have to travel, invariably by car into the town centre for this, adding to the reliance on cars and increasing traffic into the town centre. 	<ul style="list-style-type: none"> Parts 27 to 32 of the policy detail a comprehensive package of transport improvements that will be required to support the Waterfront allocation. These include a range of public transport, cycling and walking improvements to connect the new employment and residential development on the Waterfront with; Arpley Meadows Country Park; Warrington Town Centre; Bank Quay Station and south of the MSC.
<ul style="list-style-type: none"> The existing local road network is already heavily congested, which is magnified frequently when accidents occur on the M6/M56. These events often causes the town centre to become gridlocked. The overall development in this area will result in many more HGV journeys across areas of Warrington, adding to the already poor air quality as well as noise pollution. There is already significant congestion (and associated air and noise pollution) all along the A49 into Stockton Heath and A50 through 	<ul style="list-style-type: none"> The Council has assessed the level of development proposed in the Plan through a revised Multi-Modal Transport Model (WMMTM) (2021). It is accepted that the level of development proposed cannot be accommodated by the current transport network. A series of key transport infrastructure improvements are therefore required to support the proposed development allocations and the Plan as a whole. These include the Western Link, which will directly enable the development of the Waterfront area and through reducing traffic levels on the existing

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<p>Latchford at rush hour and when the swing bridges open. The expansion of Port Warrington and the associated increased water traffic along the Ship Canal will increase the need to open the swing bridges thus compounding the traffic congestion problem. There has been no assessment of the impact of increased shipping traffic on the traffic flows within South Warrington and the disruption caused by closure of swing bridges.</p>	<p>road network, it will facilitate a greater level of development within the Town Centre and across Inner Warrington. Similarly, development in the other Main Development Areas (including the South East Warrington Urban Extension and the South East Warrington Employment Location) cannot come forward without significant transport infrastructure improvements. Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. This is identified in the Local Transport Plan (LTP4) which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.</p>
<ul style="list-style-type: none"> • The rail connection does not feature in the short term plans in the Port Warrington Development Framework. Given that this is critical to reducing HGV traffic and justifying very special circumstances for releasing the land from the Green Belt, the rail connection should be a pre-requisite. • The proposal should only be supported if rail freight is used as a medium of transport and not roads. 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront. • It should be noted that there are uncertainties over Warrington’s longer term employment land supply, beyond the end of the Plan Period. As such, the Council is committed to undertaking a review into Warrington’s employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised. • The consideration of sustainable transport modes will be taken into account as part of any future assessment of employment sites.
<ul style="list-style-type: none"> • General support for the Port Warrington allocation policy, in particular the transport infrastructure improvements outlined in Part 42 of the policy 	<ul style="list-style-type: none"> • Support noted. • It should be noted however that the employment elements within the allocation are no longer being proposed in the updated PSVLP (2021)
<ul style="list-style-type: none"> • The Western Link Road scheme was consulted on as a congestion relief scheme NOT as a scheme to facilitate further development. • The Waterfront development will generate about 5000 daily car and HGV journeys via the Western Link. 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront. • The Council has significant concerns around the potential impact of Port Warrington and the Business Hub on the Western Link Road and whether these impacts can be mitigated.

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<ul style="list-style-type: none"> • The Western Link will not alleviate congestion, it will only divert traffic. Many people will use the Western Link rather than pay tolls on the other 2 Mersey crossings. • There is already traffic congestion in the area (ie. A56 and A5060). The Western Link and Centre Park Links will do little to improve the traffic congestion. • The details of the Western Link Road scheme have not been included in the policy and it is not transparent how it will be funded. Should the Western Link not receive funding on the time scales required for the implementation of the plan, there appears to be no "plan B". 	<ul style="list-style-type: none"> • It should be noted that there are uncertainties over Warrington's longer term employment land supply, beyond the end of the Plan Period. As such, the Council is committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised. • Any future of Warrington's employment land needs will be included as part of a wider review of the Local Plan and will be subject to extensive consultation.
<ul style="list-style-type: none"> • Warrington has very poor air quality with respect to pollution from road traffic. • A 2018 World Health Organisation study identifies Warrington as one of the top 10 most polluted towns in the Country (in terms of air pollution). • Increased air pollution from proposed development will increase risk of health problems. • Lower Walton in particular will be engulfed in a triangle of CO2 from constant traffic, including HGV's from Chester Rd, the new link road to Slutchers Lane and the Western Link Road. • More green spaces should be created to combat poor air quality not being destroyed. 	<ul style="list-style-type: none"> • The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process. The proposed employment allocations and urban extensions in the Plan are all dependent on infrastructure improvements to the Strategic and Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts. • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP concluded that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. Whilst, the Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the Updated PSVLP (2021) is proposing a lower level of development. The existing report is therefore considered to assess a 'worst case' scenario. Updated air quality modelling has however informed the Updated Habitats Regulation Assessment (2021).

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	<ul style="list-style-type: none"> • It is accepted that the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • All of the main development areas in south Warrington (including Warrington Waterfront) contain requirements for significant green infrastructure, strategic green links, public open space and buffer zones. The policies also require compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt.
<ul style="list-style-type: none"> • The proposed allocation will have a negative impact on the historic assets and industrial heritage of the area (ie. The Transporter Bridge; the listed bridge at Moore Ln/Lapwing Ln and locally listed buildings). 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to include the employment elements of the Warrington Waterfront allocation. As such any potential impacts on historic assets will be significantly reduced. The allocation is supported by a Heritage Impact Assessment (HIA), which was shared with Historic England during the previous Reg 19 consultation and found to be acceptable, subject to a number of minor modifications to the wording of the policy. The suggested amendments have been incorporated into the revised policy in the Updated PSVLP (2021), where appropriate.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • The primary purpose for the expansion of Port Warrington is to address the shortfall of available land in the Mersey Ports Masterplan and this is based on Peel owned land. The impact on Warrington's roads will be significant despite the stated multi-modal transport via the use of road, rail and waterways. The proposals offer no benefits for local people or the town. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2021) using data which post-dates the EU Brexit referendum. The Council no longer considers the previous scale of jobs growth to be realistic. The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations. • The Council has re-assessed all of the potential employment sites submitted for consideration as part of the Local Plan process to take into account the most up to date evidence and market considerations. This

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	<p>includes assessment as part of the updated EDNA and then assessment in accordance with the Council's site selection process, taking into account the Plan's objectives, and SA/SEA.</p> <ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront. In addition to the loss of part of Moore Nature Reserve, the Council has significant concerns around its potential impact on the Western Link Road and whether these impacts can be mitigated. • It should be noted that there are uncertainties over Warrington's longer term employment land supply, beyond the end of the Plan Period. As such, the Council is committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised. • Any future of Warrington's employment land needs will be included as part of a wider review of the Local Plan and will be subject to extensive consultation.
<ul style="list-style-type: none"> • Objection to any loss of Moore Nature Reserve. 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront, which would have resulted in the loss of part of Moore Nature Reserve. • In addition to the loss of part of Moore Nature Reserve, the Council has significant concerns around its potential impact on the Western Link Road and whether these impacts can be mitigated. • It should be noted that there are uncertainties over Warrington's longer term employment land supply, beyond the end of the Plan Period. As such, the Council is committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key

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	<p>infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.</p> <ul style="list-style-type: none"> • Any future of Warrington’s employment land needs will be included as part of a wider review of the Local Plan and will be subject to extensive consultation.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • Support in principle for the allocation of Warrington Waterfront from developers outside of the site. However, there are a number of issues raised. In summary these are: <ul style="list-style-type: none"> ○ It is considered that the housing trajectory for the allocation is challenging due to the considerable lead-in timescale required for the Western Link Road. It is recommended that the housing trajectory set out in the Plan is amended accordingly. ○ It is considered that over half of the Waterfront site is located with Flood Zone 3a, and at risk of tidal flooding. As such, it is recommended that an Exception Test needs to be carried out and the scale of development reduced accordingly. 	<ul style="list-style-type: none"> • Support noted. • It should be noted however that the updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront. • In preparing the Local Plan’s housing trajectory the Council has given detailed consideration to the rate that new homes can be built and the lead-in-times required for infrastructure. The Council has undertaken additional master planning work in the town centre and surrounding area to confirm the housing land capacity and lead-in-times, which is now incorporated into the latest SHLAA (2020). As part of this work the residential capacity of the Waterfront allocation has been reduced from 2,000 to around 1,335 new homes in the Updated PSVLP (2021), of which 1,070 are expected to be delivered within the Plan Period. • It is acknowledged that due to the requirement to provide the Western Link in advance of any development that there will be a lower level of completions in early years of the Plan. The additional work that the Council has undertaken indicates that the first homes are expected to be completed 2027/28. • The Council has carried out Strategic Flood Risk Assessments in line with government guidance. The Master plan will take account of vulnerability to flood and locate development where acceptable. For instance in cases where there is a flooding issue water compatible development will be proposed this includes, docks, marina’s, wharfs, amenity open space,

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Summary of Issues Raised	Response
	nature conservation and biodiversity and outdoor sports provision. In areas where there is no flood risk or less risk then residential and services will be considered.
<ul style="list-style-type: none"> • Strong support for the allocation of Warrington Waterfront from landowner and developers with holdings in the area. 	<ul style="list-style-type: none"> • Support noted. • It should be noted however that the updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront.
<ul style="list-style-type: none"> • A number of detailed alterations to the wording of the policy are suggested to ensure it aligns with the ambitions and objectives of the delivery of the Warrington Waterfront proposal and to ensure it meets the tests of soundness in accordance with the Framework. These primarily relate to the employment elements of the allocation. 	<ul style="list-style-type: none"> • The updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront.
<ul style="list-style-type: none"> • Objection from one developer to the allocation as it is considered that there are great uncertainties and infrastructure requirements to be overcome for this site to be brought forward. As such housing on this site as proposed in the local plan is uncertain. 	<ul style="list-style-type: none"> • The Council who are promoting the allocation have confirmed their commitment to ensuring comprehensive form of development. The Council is confident that the programme for the Western Link will enable the first homes in the allocation to be completed by 2027/28.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment. 	<ul style="list-style-type: none"> • Support noted. • It should be noted however that the updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront.
<ul style="list-style-type: none"> • However, Historic England suggest a number of modifications to the wording of the policy to ensure that it is better aligned with the NPPF and with the content of the HIA, in summary these are: <ul style="list-style-type: none"> ○ Amend the wording of Para 57 of the policy to read: Development will be required to preserve and enhance the historic environment, heritage assets and their setting. ○ Amend the wording of Para 58 of the policy to read: Development proposals will be required to be in accordance with the Waterfront Heritage Impact Assessment including the 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to include the employment elements of the Warrington Waterfront allocation. As such any potential impacts on historic assets will be significantly reduced. The allocation is supported by a Heritage Impact Assessment (HIA), which was shared with Historic England during the previous Reg 19 consultation and found to be acceptable, subject to a number of minor modifications to the wording of the policy. The suggested amendments have been incorporated into the revised policy in the Updated PSVLP (2021), where still relevant.

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<p>proposed mitigation and enhancement measures. Also remove bullets (a) & (b) to ensure consistency with the NPPF.</p> <ul style="list-style-type: none"> ○ Amend the wording of Para 59 of the policy to read: Development proposals will need to demonstrate how it will safeguard and sustain the future of the Bank Quay Transporter Bridge (Grade II*) which is currently on the Heritage at Risk Register. A planning contribution will be expected from both the residential and employment development towards securing the future of this heritage asset. 	<ul style="list-style-type: none"> ● The exception is the inclusion of a requirement for a planning contribution from the residential development towards securing the future of the Grade II* Bank Quay Transporter Bridge. This requirement has not been included as the Updated Viability Assessment (2021) indicated that the development could not support such a contribution.
<ul style="list-style-type: none"> ● Cheshire West & Chester Council have some concerns relating to the proposed Green Belt release and significant allocation for housing and employment development at: MD1 Warrington Waterfront, MD2 Garden Suburb and MD3 South West Urban Extension, which collectively have the potential to impact on both CWAC's road network and the Strategic Road Network (including the M56 and M6). CWaC considers that the locations with potential capacity issues include: <ul style="list-style-type: none"> ○ M56, Jtn 10 – linking A559 back to Northwich. ○ M6, Jtn 20 – main link back onto M6. ○ M6, Jtn 19 – linking A556 back to Northwich. <p>Further modelling work is needed to understand the impacts on the SRN outside of the Borough, along with sensitivity testing results and also the need to test the full 7,400 new homes in the Garden Suburb, within the Plan period 2017-2037.</p> 	<ul style="list-style-type: none"> ● It should be noted that the scale of development proposed in the updated PSVLP (2021) is significantly lower than that of the previous version of the Plan. ● The Council has assessed the impacts of the updated PSVLP through an update of the Local Plan transport model. ● The Council has engaged with CW&C through the duty to Co-operate and will continue to do so to ensure any concerns on the transport impacts of the Plan are addressed.
<ul style="list-style-type: none"> ● United Utilities supports the requirement for exemplary sustainable drainage systems within the Policy. It is acknowledged that there are likely to be proposed infrastructure improvements required to accommodate the proposed growth in this area. It is important to highlight that there may be an opportunity to coordinate the delivery of any infrastructure improvements alongside new transport schemes. 	<ul style="list-style-type: none"> ● Support noted. ● The wording of the policy has been modified in the Updated PSVLP (2021) along the lines requested by United Utilities.

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<ul style="list-style-type: none"> • United Utilities recommend a number of amendments to the wording of Parts (6) and (51) of the policy so as to achieve a sustainable and holistic drainage strategy. 	
Other	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust (CWT) - The NPPF 2018 sets out in its introductory paragraphs that conserving the natural environment is one of the three core objectives of the planning system (paragraph 8c). Protecting, enhancing and safeguarding local sites is specifically referenced in paragraphs 170, 171, 174. The nature reserve is an important asset to the local community. The proposals will result in the loss of approximately 50% of the Local Wildlife Site (LWS). The remaining areas of the LWS will be integrated as Public Open Space resulting in a change of land use with potential negative impacts such as additional disturbance, pollution and invasive species. • CWT are concerned that it has not been demonstrated that the mitigation hierarchy has been robustly applied through the consideration of alternative proposals in order to avoid significant harm to biodiversity (paragraph 175a of the NPPF). As a last resort offsite compensation for the loss of biodiversity must be secured following good practice guidance (i.e. Biodiversity Net Gain: Good practice principles for development CIEEM, CIRIA, IEMA, 2016). • CWT – The outline proposals for Warrington Waterfront show a ‘mixed use development site’ on an area of the Arpley mitigation which was marked as an ‘undisturbed area’ with no public entry, standing water, semi-improved grassland, woodland and barn owl mitigation. These benefits will be lost under the proposals for Warrington Waterfront. • CWT - The overall biodiversity value of the Arpley landfill mitigation will be considerably reduced by the plans for Warrington Waterfront. The proposals for the Waterfront appear to show that parts of Arpley Country Park will be used as mitigation for the loss of biodiversity. This 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront, which would have resulted in the loss of part of Moore Nature Reserve. • The policy in the Updated PSVLP (2021) includes recommendations made by CWT (and others) in respect of biodiversity net gain and recommendations from the Updated Habitats Regulation Assessment (2021) in respect of providing evidence that the development will not have any adverse impacts on the integrity of the Mersey Estuary Special Protection Area with regard to Functionally Linked Land.

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<p>is <u>unacceptable</u> as mitigation cannot be double counted. The proposed additional plantation woodland and scrub will reduce the value gained from the species-rich and semi-improved grassland secured for the landfill mitigation (ideal for barn owls and invertebrates).</p>	
<ul style="list-style-type: none"> • Concern that “Warrington Bridge at Bridgefoot” is going to be pedestrianised as part of the Waterfront proposals and that this would cause gridlock. 	<ul style="list-style-type: none"> • There are no proposals to pedestrianise Warrington Bridge, as part of the Waterfront allocation.
<ul style="list-style-type: none"> • Residents of Moore village (adjoining authority of Halton) object to the Waterfront allocation on the following grounds: <ul style="list-style-type: none"> ○ It will destroy Moore Nature Reserve, causing the loss of habitat for a number of endangered species and the loss of a recreation resource. There is no environmental or ecological impact assessment of the proposals. ○ It will be impossible to recreate the lost wildlife habitats through a mitigation scheme. ○ The proposals will impact on the amenity of residential properties on the south side of the MSC. The Port would operate 24 hrs a day causing noise and traffic disturbance. ○ The development of Port Warrington in combination with all of the other development proposed in south Warrington (SWUE and Garden Suburb) and in neighbouring local authority areas (Manchester councils are allowing the building and expanding of transport hubs around the M60 and M62) will increase congestion on the surrounding motorways and SRN. ○ The main driver for the Western Link Road is Peel Ports and their need for a suitable HGV access route for the proposed expansion of Port Warrington (PW) and not to relieve congestion around Bridgefoot as advertised. ○ All HGV traffic from PW will be routed south over the new bridge, thus bringing added congestion and pollution to 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront, which would have resulted in the loss of part of Moore Nature Reserve. • In addition to the loss of part of Moore Nature Reserve, the Council has significant concerns around its potential impact on the Western Link Road and whether these impacts can be mitigated. • It should be noted that there are uncertainties over Warrington’s longer term employment land supply, beyond the end of the Plan Period. As such, the Council is committed to undertaking a review into Warrington’s employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised. • Any future of Warrington’s employment land needs will be included as part of a wider review of the Local Plan and will be subject to extensive consultation. • The Council does not therefore consider that the revised allocation at the Waterfront will have any significant impact on the residents of Moore Village.

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<p>Moore, Walton and Stockton Heath residents. In addition, the increase in container ships berthing at the port will significantly increase air pollution (When in port, these ships burn about 65 gallons per hour of heavy fuel oil).</p> <ul style="list-style-type: none"> ○ There is no justification for a port at Warrington. There are perfectly working ports at Runcorn and at Ellesmere Port, capable of taking large ships. ○ The proposals are contrary to paragraphs 184-185 of the NPPF and will impact on heritage assets (Moore village CA and listed buildings therein and to the listed Moore Lane bridge. ○ The proposals are contrary to paragraph 180 of the NPPF and will impact on the character of Moore village. ○ Policy MD1 (and GB1) is contrary to national Green Belt policy and the objectives of the Plan as it does not maintain a gap between Warrington and Runcorn. The extent of the Waterfront allocation should be reduced in order to maintain a gap between Warrington and Runcorn to stop them merging. 	
<ul style="list-style-type: none"> ● The residents of Promenade Park (Static home site in adjoining authority of Halton) suggest a number of amendments to the wording of the policy as follows: <ul style="list-style-type: none"> ○ Part 8 of Policy MD1 should specifically prohibit any development until after the Western Link is built; prevent any HGV traffic travelling south to Moore village and any increase in traffic generally along Moore Lane. ○ Part 55 of Policy MD1 should include a requirement for a generous landscaped buffer along the MSC to act as a visual screen and provide acoustic measures to protect the amenity of residents of Moore village and Promenade Park. 	<ul style="list-style-type: none"> ● The Updated PSVLP (2021) is no longer proposing to allocate the employment elements of the Warrington Waterfront. Consequently, the allocation will not generate any significant HGV movements. ● Part 7 (formerly Part 8) specifies that no development will be permitted until funding has been secured and a programme of delivery has been confirmed for the Western Link. Whilst, this will not specifically prohibit any development until after the Western Link has been completed, the associated phasing requirements will enable the Council to control when any development comes forward.
<ul style="list-style-type: none"> ● The Trans Pennine Trail operators should be consulted on the implications of the existing alignment of the TPT and also future potential 	<ul style="list-style-type: none"> ● The Trans Pennine Trail operator's comments are noted.

Policy MD1 - Waterfront (including Port Warrington)	
Summary of Issues Raised	Response
<p>this development holds in terms of sustainable transport routes and links to the TPT.</p> <ul style="list-style-type: none"> • The Trans Pennine Trail operators support Parts 24-30 (Open space and recreation requirements) and Part 44 of Policy MD1. Advise that long term maintenance of such facilities should be built into the proposal to avoid further drain on Warrington's budgets. • The Trans Pennine Trail operators suggest an amendment to Part 42(d) of Policy MD1 to require a direct cycle link to also be provided between Moore Lane and the proposed Country Park in addition to a pedestrian link. 	<ul style="list-style-type: none"> • The Council considers that the allocation policy and wider Local Plan policies support provision of new cycle links.

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The proposed plans will create traffic chaos in the south Warrington areas 	<ul style="list-style-type: none"> • The revised South East Warrington Urban Extension allocation is significantly smaller than the previous Garden Suburb allocation, which will reduce the pressure on the surrounding transport network. The allocation policy requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Local Plan Transport Model to ensure the transport network can accommodate the proposed level of growth.
<ul style="list-style-type: none"> • The proposals for additional employment land for logistic operations in south Warrington will increase the amount of HGV traffic around the existing settlements as drivers avoid the M6. 	<ul style="list-style-type: none"> • The separate South East Warrington Employment Area policy states that employment development will not be commenced until the funding and the programme for delivery of improvements at Junction 20 of the M6 have been agreed with key stakeholders, including Highways England and the Local Highway Authority. Additional infrastructure improvements required by the allocation policy will ensure that HGV traffic is able to efficiently access the motorway. As such, the Council is confident that HGV traffic will not have a detrimental impact on existing and future residential areas in south Warrington.
<ul style="list-style-type: none"> • The plan fails to respond to climate change increasing housing on this scale will increase pollution. 	<ul style="list-style-type: none"> • In line with the requirements of the NPPF the updated Plan is supporting a transition to a low carbon future in a changing climate. The South East Warrington Urban Extension allocation includes specific measures to reduce dependency on the car, support public transport, cycling and walking and increase the energy efficiency of new development.
<ul style="list-style-type: none"> • The justification for the number of houses is not sound and proposals are based on unrealistic growth predictions with prediction based on out of date data. 	<ul style="list-style-type: none"> • The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
	<p>jobs growth to be realistic and is confident that a housing target of 816, in line with the minimum housing need figure under the Government's standard housing methodology, will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.</p>
<ul style="list-style-type: none"> • The jobs provided through release of land for logistics will not supply housing to those employed as they will be too expensive and the housing will be for commuters to Liverpool and Manchester. 	<ul style="list-style-type: none"> • An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area, of which the majority will be located north of the Ship Canal, the Spatial Strategy is ensuring that a large number of new homes will benefit from being in proximity to established and newly developed employment locations. Through ensuring improvements to transport infrastructure, new and existing residents in south Warrington will be able to access these employment opportunities. With regard to new employment locations, the Fiddlers Ferry allocation will provide a wide range of jobs accessible to residents of north Warrington, with the new Western Link improving access for residents of south Warrington. The South East Warrington Employment Area will provide a major new employment site in south Warrington. This will again provide a range of jobs, but the Council acknowledges that the predominant uses will be warehousing and distribution and therefore there will be a relatively large number of lower skilled jobs. This emphasises the importance of providing a wide range of housing types in the proposed south Warrington urban extensions, including provision of 30% affordable housing, to ensure that employees have the opportunity to live in close proximity to their work. The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling.

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • There will be limited provision of affordable homes as the prices in south Warrington are 30% higher than in the rest of the borough. 	<ul style="list-style-type: none"> • New development in south Warrington will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council’s housing waiting list. A third will be for low cost home ownership, of which the majority will be ‘First Homes’ specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers.
<ul style="list-style-type: none"> • The character of the villages of Appleton, Appleton Thorn, Stretton and Grappenhall Heys will be lost as they are submerged by new housing. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. In preparing the Plan, the Council has worked closely with statutory consultees including Historic England, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard. • It should be noted that the South East Warrington Urban Extension in the updated PSVLP is significantly smaller than the previous Garden Suburb allocation, with Green Belt land separating the allocation from Appleton Thorn.
<ul style="list-style-type: none"> • The proposed development will destroy valuable countryside and ruin existing wildlife and floral habitats. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council has ensured that the allocation policy

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
	<p>includes specific provision to protect ecology. Where there are impacts on important ecological assets, the Plan requires extensive mitigation to offset the loss of habitat and the allocation policy requires an overall net increase in biodiversity. In preparing the Plan, the Council has worked closely with statutory consultees including Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard.</p> <ul style="list-style-type: none"> • It should be noted that the South East Warrington Urban Extension in the updated PSVLP is significantly smaller than the previous Garden Suburb allocation, with less land removed from the Green Belt for development.
<ul style="list-style-type: none"> • The proposed infrastructure is poorly thought out and will not meet needs that result from the development proposed, for example road and canal crossings have not been addressed. 	<ul style="list-style-type: none"> • The revised South East Warrington Urban Extension allocation is significantly smaller than the previous Garden Suburb allocation, which will reduce the pressure on the surrounding transport network. The allocation policy requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Local Plan Transport model to ensure the transport network can accommodate the proposed level of growth. • The allocation policy requires provision of new schools, health and sports and leisure facilities to support the new residential population. • Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. This is identified in Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.
<ul style="list-style-type: none"> • Funding for infrastructure has not been addressed and it should be in place prior to any development occurring. 	<ul style="list-style-type: none"> • The Council has undertaken the preparation of a full revised Local Plan Viability Assessment in support of the updated PSVLP. As part of this

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
	<p>work, the Council has reviewed all infrastructure requirements and costs for the South East Warrington Urban Extension in consultation with developers promoting the allocation. This work demonstrates that the infrastructure required to deliver the urban extension capable of being delivered.</p> <ul style="list-style-type: none"> • The allocation policy will ensure the timely delivery of supporting infrastructure. This is important given the existing constraints on transport and community infrastructure in South Warrington.
<ul style="list-style-type: none"> • The plan does not detail the amount and type of Green Infrastructure to be provided through the Garden Suburb plans. 	<ul style="list-style-type: none"> • The allocation policy requires the provision of a range of types and sizes of open space in line with the Council’s open space standards. This will include provision of local parks and gardens; natural and semi-natural greenspace; equipped and informal play areas; sports pitches; and allotment plots. The allocation policy also requires a scheme for measurable biodiversity net gain for all development parcels that come forward for planning approval
<ul style="list-style-type: none"> • There will be increased flooding as a result of the proposed developments. 	<ul style="list-style-type: none"> • The Council has undertaken a Strategic Flood Risk Assessment in considering potential development allocations in the updated PSVLP. • The allocation policy requires a site-wide foul and surface water strategy across the South East Warrington Urban Extension as a whole, incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures. The surface water strategy will be required to improve on greenfield run-off rates. • As such the Council is confident that there will not be increased flooding as a result of the proposed allocation.
<ul style="list-style-type: none"> • Public transport is already poor in south Warrington and the current proposals do not properly address the need for developing systems including LRT systems and bus corridors. 	<ul style="list-style-type: none"> • The updated PSVLP closely reflects the Council’s new Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South West Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport.

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Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP (2021) includes a range of measures to improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes.
<ul style="list-style-type: none"> • The proposals do not properly consider cycle networks 	<ul style="list-style-type: none"> • The allocation policy requires improved cycling and walking routes well related to the green infrastructure network and requires the layout of development to provide new footpaths and cycleways that link to existing networks beyond the site.
<ul style="list-style-type: none"> • Concentrating development in south Warrington will not support the regeneration of the town centre 	<ul style="list-style-type: none"> • The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential economic benefits of focussing development, including that proposed in south Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington.
<ul style="list-style-type: none"> • The amount of housing planned for south Warrington is disproportionate and the spread and amount of housing over the borough should be re-thought 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. • It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP and that the majority of the new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal.
<ul style="list-style-type: none"> • Not enough consideration of the development of brownfield land prior to Green Belt, for example Fiddlers Ferry decommissioning and potential redevelopment. 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual

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Summary of Issues Raised	Response
	<p>basis. The Council has also undertaken additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this is now incorporated into the SHLAA. As such the Council is confident the Updated PSVLP (2021) will maximise the amount of development that is possible on brownfield land.</p> <ul style="list-style-type: none"> • The Updated PSVLP (2021) now allocates the Fiddlers Ferry Site for development, the majority of which will come forward in the Plan Period. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
<ul style="list-style-type: none"> • Justification in the plan at para 3.3.17 relating to the options assessment process is contradictory to bullet points 1,3, and 4 and fails to appreciate the current position 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt.
<ul style="list-style-type: none"> • Within the proposed Garden Suburb a strategic road is suggested to carry traffic from the residential areas on to the main travel routes. Although the path of this road has yet to be finalised, the concept path in the LDP plans has major problems, since it would traverse an area, known as Appleton Cross which already has planning permission for 375 houses. This would appear to make the proposal unsound. 	<ul style="list-style-type: none"> • The new transport infrastructure required to support the urban extension remains a concept at this stage. The eventual alignments of new roads and green links will be agreed with the Local Highways Authority and landowners in the South East Warrington Urban Extension when detailed development proposals come forward.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • Concerns that the proposals will lead to increased traffic from both new residents of the housing and HGV traffic resulting from the industrial areas allocated. 	<ul style="list-style-type: none"> • The revised South East Warrington Urban Extension allocation is significantly smaller than the previous Garden Suburb allocation, which will reduce the pressure on the surrounding transport network. The allocation policy requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Local Plan Transport model to

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
	<p>ensure the transport network can accommodate the proposed level of growth.</p> <ul style="list-style-type: none"> • The separate South East Warrington Employment Area policy states that employment development will not be commenced until the funding and the programme for delivery of improvements at Junction 20 of the M6 have been agreed with key stakeholders, including Highways England and the Local Highway Authority. Additional infrastructure improvements required by the allocation policy will ensure that HGV traffic is able to efficiently access the motorway. As such, the Council is confident that HGV traffic will not have a detrimental impact on existing and future residential areas in south Warrington.
<ul style="list-style-type: none"> • The details of the planned strategic link road and associated junctions are insufficient and where there are details the road's width appears to be serving HGV traffic and it will become a substitute road for M6 traffic. 	<ul style="list-style-type: none"> • The new transport infrastructure required to support the urban extension remains a concept at this stage. The eventual alignments of new roads and green links will be agreed with the Local Highways Authority and landowners in the South East Warrington Urban Extension when detailed development proposals come forward. • In considering the width of new roads within the allocation, the Council has ensured there is sufficient space for separate walking and cycling provision and to provide sufficient space for a future mass transit system. • Required transport infrastructure improvements for the South East Warrington Employment Area will ensure that HGV Traffic will have ease of access to the M6 J20 and will not have a detrimental impact on existing and future residential areas in south Warrington
<ul style="list-style-type: none"> • The funding for the infrastructure provision should be identified and in place before the start of any development. 	<ul style="list-style-type: none"> • The Council has undertaken the preparation of a full revised Local Plan Viability Assessment in support of the updated PSVLP. As part of this work, the Council has reviewed all infrastructure requirements and costs for the South East Warrington Urban Extension in consultation with developers promoting the allocation. This work demonstrates that the infrastructure required to deliver the urban extension capable of being delivered.

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The allocation policy will ensure the timely delivery of supporting infrastructure. This is important given the existing constraints on transport and community infrastructure in South Warrington.
<ul style="list-style-type: none"> • Poor provision for public transport will lead to increased car journeys 	<ul style="list-style-type: none"> • The updated PSVLP closely reflects the Council’s new Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South West Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport. • The allocation policy for the South East Warrington Urban Extension in the updated PSVLP includes a range of measures to improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes..
<ul style="list-style-type: none"> • The air quality will worsen in South Warrington as a result of these proposals which is contrary to other policies in the plan. 	<ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • The Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the updated PSVLP is proposing a lower level of development. The existing report is therefore considered to assess a ‘worst case’ scenario. Updated air quality modelling has however informed the updated Habitats Regulation Assessment.

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Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Most importantly in the context of the Local Plan, planning applications will be closely scrutinised to ensure that air quality has been appropriately considered, to ensure that opportunities to improve air quality are not missed, and to ensure that developments that could have a significant detrimental impact are not approved.
<ul style="list-style-type: none"> • The proposals for new housing and employment provision will overwhelm the existing village settlements and they will lose their distinct identities 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. In preparing the Plan, the Council has worked closely with statutory consultees including Historic England, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard • It should be noted that the South East Warrington Urban Extension in the updated PSVLP is significantly smaller than the previous Garden Suburb allocation, with Green Belt land separating the allocation from Appleton Thorn.
<ul style="list-style-type: none"> • The historic characteristics of the village settlements have been overlooked. 	<ul style="list-style-type: none"> • The Council has taken heritage and the character of existing settlements into account in assessing development options for the updated PSVLP. • The Council has undertaken a Heritage Impact Assessment of the proposed South East Warrington Urban Extension in consultation with Historic England. Development within the Urban Extension will be required to be designed in order to ensure that heritage assets and their settings are conserved and, where appropriate, enhanced within the

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
	context of the overall development, through appropriate mitigation measures, having regard to Heritage Impact Assessment.
<ul style="list-style-type: none"> • The made Neighbourhood plan for Appleton Thorn has not been taken into consideration. 	<ul style="list-style-type: none"> • The Council has taken the Appleton Thorn Neighbourhood Plan into account in preparing the emerging Local Plan and in particular in allocating the South East Warrington Urban Extension in the updated PSVLP. It should be noted that the South East Warrington Urban Extension in the updated PSVLP is significantly smaller than the previous Garden Suburb allocation, with Green Belt land separating the allocation from Appleton Thorn. • The Appleton Thorn Plan was prepared in the context of the Council's adopted Local Plan. In making representations to the Neighbourhood Plan, the Council stated that there may be a requirement for the Neighbourhood Plan to be reviewed once the new Local Plan had been prepared, given the requirement for the Council to plan positively to meet Warrington's future development needs.
<ul style="list-style-type: none"> • Stretton is represented as a washed over Green Belt settlement however the proposals for the Garden suburb show the village quadrupling in size and being one and the same as village A. Stretton should be identified and treated the same as other existing settlements and new villages with provision of green infrastructure and community facilities. 	<ul style="list-style-type: none"> • That part of Stretton Village which lies to the east of the A49 will no longer be a washed over Green Belt settlement due to its proximity to the South East Warrington Urban Extension resulting in it now becoming part of the main urban area. Part of the existing settlement of Stretton to the west of the A49 will remain as a washed over Green Belt settlement. To protect this Green Belt settlement, albeit reduced in size, provision has been made within Policy MD2 to ensure that any development at the western end of the South Warrington Urban Extension is sensitive to the washed over settlement and the Green Belt in this location.
<ul style="list-style-type: none"> • Suggested amendment point 53 adding the following clause 'The green belt boundary to the west of any Garden Suburb shall be defined by the roman road, King Street, with a green buffer zone eastward to the topographical ridge line.' 	<ul style="list-style-type: none"> • The revised Green Belt boundary to the west of the South East Warrington Urban Extension will be defined by the A49 as shown on the Policies Map.

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The Proposed SPD should be given a date for completion and locations identified specified infrastructure at point 5. 	<ul style="list-style-type: none"> • The updated allocation policy requires the preparation and approval by the Council of a Development Framework, prior to the submission of any planning applications for development of the South East Warrington Urban Extension, in order to guide development in accordance with the policy. The Development Framework will be prepared by the principal landowners, in consultation with the Council, key statutory consultees and the local community. To ensure a holistic approach to the delivery of the Urban Extension, the Development Framework will provide a comprehensive spatial masterplan that identifies primary development parcels and the location of key physical, social and environmental infrastructure, alongside a phasing strategy and trajectory, which identifies when key infrastructure is required, how it will be funded and the mechanism for delivery. The Development Framework will establish a range of parameters for the development of the Urban Extension, including, but not limited to: development areas (reflecting a mix of land uses including residential, retail and community i.e. schools), densities, strategic movement linkages, road network typologies and strategic blue and green infrastructure. It will be important for the Development Framework to be sufficiently flexible and kept under review throughout the delivery of the Urban Extension, to react to changing circumstances where necessary.
<ul style="list-style-type: none"> • Any decentralised energy system should not include wind turbines. 	<ul style="list-style-type: none"> • As set out in Policy ENV7, in assessing any large scale renewable energy schemes prominent in the landscape the Council will carefully weigh up the environmental, social and economic benefits against any effects on the local area, such as impacts on landscape character, heritage assets or the Green Belt.
<ul style="list-style-type: none"> • Support for a community recycling centre in south Warrington 	<ul style="list-style-type: none"> • Support noted.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • Support in principle from landowner and developers with holdings in the Garden Suburb area. 	<ul style="list-style-type: none"> • Support noted.

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	<ul style="list-style-type: none"> • It should be noted however that the South East Warrington Urban Extension in the updated PSVLP is significantly smaller than the previous Garden Suburb allocation, with less land removed from the Green Belt for development.
<ul style="list-style-type: none"> • Proposed modification to wording at point 14 which would allow development to take place prior to the approval of the SPD if the development proposal is able to physically and financially deliver the necessary essential infrastructure required to support the development and the wider objectives of this policy. 	<ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the updated PSVLP requires a Development Framework to be agreed with the Council in advance of planning applications being submitted. The Framework will include an infrastructure delivery plan, with details on phasing, delivery triggers and delivery responsibilities. The policy also confirms that no residential development will be permitted to commence until the funding and the programme for the delivery of a highway scheme to relieve the A49 London Road/B5356 Stretton Road junction has been confirmed and works have commenced on site. • This approach is considered essential given the existing constraints on transport and community infrastructure in South Warrington.
<ul style="list-style-type: none"> • The policy is over long and too detailed, a collaborative approach to the SPD will allow delivery of the Garden Suburb and the policy should be tidied up. A number of suggested amendments are made to remove detail from the policy and to allow much greater flexibility. 	<ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the updated PSVLP is considered proportionate in detail to the size of the proposed urban extension and its context in south Warrington. The policy provides the key development principles and requirements from which a more detailed Development Framework can be prepared. The framework will provide more detail on the form, nature and timing of development and supporting infrastructure, in advance of planning applications being submitted.
<ul style="list-style-type: none"> • The policy for the Garden Suburb is too restrictive and the aspirations for the Garden Suburb need to be translated to a smaller scale and allow for delivery of smaller sites. 	<ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the updated PSVLP will ensure that development is comprehensively planned with the timely delivery of supporting infrastructure. Small scale incremental development would and undermine this approach.

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<ul style="list-style-type: none"> • Concern from developers whose land has an indicative allocation for the Country Park. 	<ul style="list-style-type: none"> • The land previously proposed for the Country Park is not included in the South East Warrington Urban Extension allocation in the updated PSVLP.
<ul style="list-style-type: none"> • The amount of homes allocated within the Garden Suburb during the plan period should be referred to as a minimum and flexibility should be built into allocations including safeguarded land. 	<ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the updated PSVLP confirms that the number of homes is a minimum number. Rather than safeguarding land, the allocation has capacity to deliver around 1,800 homes beyond the Plan Period.
<ul style="list-style-type: none"> • The build rates for the Garden Suburb are not deliverable over the plan period and other sites should be allocated to ensure that housing targets are met. 	<ul style="list-style-type: none"> • The Council has reviewed build rates for all of its proposed allocation sites to ensure they are realistic. The average build rate of 180 dwellings per annum is considered achievable based on similar developments elsewhere in the country and has been agreed with the site promoters. It is significantly lower than the average build rate of 300 dwellings per annum that was proposed for the previous Garden Suburb allocation (Green Belt release component).
Statutory Consultees	
<ul style="list-style-type: none"> • Cheshire West and Chester (CW&C) and Cheshire East have raised concerns on of the impact of development on the strategic motorway network (M6 junctions 19 and 20; the M56 Junction 10 and the M56/M6 interchange) together with the impact on adjacent local roads. More transport modelling is called for plus associated improvements. 	<ul style="list-style-type: none"> • Through the Duty to Cooperate process, the Council is in ongoing discussions with Highways England and both Cheshire Authorities to ensure both the Local and Strategic Road Network will have the required mitigation measures in place to accommodate new development.
<ul style="list-style-type: none"> • Cheshire East are concerned that the development policies do not consider adequately pharmacy needs or is linked to the Pharmacy Needs Assessment (PNA), the 2 plans need to be linked and a revised PNA carried out. 	<ul style="list-style-type: none"> • The Council has engaged extensively with NHS partners, including NHS Warrington CCG, to ensure that the Plan as a whole and the South East Warrington Urban Extension allocation policy makes appropriate provision for health facilities.
<ul style="list-style-type: none"> • Historic England consider that the draft Garden Suburb Development Framework does not go far enough to mitigate harm to the historic environment. Historic England have proposed a number of additional points to be included in the Heritage Assessment that will add to mitigation measures where development may impact on or encroach on the historic environment referenced at point 67. 	<ul style="list-style-type: none"> • The Council has engaged extensively with Historic England in preparing the updated PSVLP, including in the preparation of new Heritage Impact Assessments for the South East Warrington Urban Extension and the South East Warrington Employment Area.

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<ul style="list-style-type: none"> Highways England comment that they are working with Council and would like to see more work on: highway development and networks, sustainable transport and mitigation measures against forecast increases in traffic. 	<ul style="list-style-type: none"> Comment noted. The Council has engaged extensively with Highway England in preparing the updated PSVLP, including the revised South East Warrington Urban Extension allocation.
<ul style="list-style-type: none"> United Utilities Ltd (UU) have proposed a number of changes that allow for the whole systems developed for waste, clean water and surface run off to be connected and approved including access arrangements to be agreed/unfettered and that pumping stations should not predominate in the plans. 	<ul style="list-style-type: none"> The Council has taken this representation into account in preparing the allocation policy for the South East Warrington Urban Extension in the updated PSVLP. It is considered that a number of the detailed points will be more appropriately addressed in the Development Framework and in consideration of individual planning applications coming forward within the allocation area.
<ul style="list-style-type: none"> Manchester Airport has requested that the airport be included as a beneficial locational relationship to the site and that they be included in discussions on transport and employment 	<ul style="list-style-type: none"> The Council acknowledge the importance of Manchester Airport but do not consider it necessary to amend the policy. Consultation on public transport proposals that may link to surrounding facilities will take place as a matter of course and include both Manchester and Liverpool Airports.
Other (91):	
<ul style="list-style-type: none"> Lumb Brook Millennium Trust – Land in private ownership should not be allocated in the Garden Suburb 	<ul style="list-style-type: none"> This land is excluded from the South East Warrington Urban Extension boundary. Where any areas of protected green space fall within the allocation boundary these will continue to be protected as green infrastructure within Policy MD2.
<ul style="list-style-type: none"> National Custom and Self-Build Association welcomes the allocation to this area of development of suitable plots but also hopes that numbers match demand 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> Cheshire Wildlife Trust comment that the allocation incorporates Grappenhall Heys Local Wildlife Site (parts 1 and 2) and the Dingle and Fords Rough LWS/Ancient woodland. Both of these sites contain priority habitats and support priority species and both sites must be excluded from the allocations in order to comply with the emerging Warrington policies and the NPPF. 	<ul style="list-style-type: none"> Grappenhall Heys Local Wildlife site Part 1 falls within the allocation boundary of the South East Warrington Urban Extension, however this has been identified as green Infrastructure and will be protected under the provisions of Policy MD2. Part 2 falls outside of the allocation boundary. A small area of the Dingle and Fords Rough LWS also falls within the allocation boundary – again this will be protected as green infrastructure within Policy MD2.

Policy MD2 - Garden Suburb	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Residents of neighbouring authorities have commented: <ul style="list-style-type: none"> ○ The release of land for employment purposes in the Garden Suburb is unjustified and there is capacity at Omega ○ Traffic issues resulting from the proposed developments will overwhelm network capacity and increase air pollution. 	<ul style="list-style-type: none"> • The Council has undertaken an update of its Economic Development Needs Assessment and a review of its existing employment land supply. From this the Council has concluded that it does not have sufficient employment land to meet its needs over the Plan Period. Having assessed a wide range of options, the Council has concluded that the South East Employment Area, together with Fiddlers Ferry Power station, provide the best sites for meeting Warrington future employment needs when assessed against the Plan’s objectives and against sustainability criteria, including the outcome of the Plan’s Sustainability Appraisal / Strategic Environmental Assessment. • The revised South East Warrington Urban Extension allocation is significantly smaller than the previous Garden Suburb allocation, which will reduce the pressure on the surrounding transport network. The allocation policy requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Local Plan Transport model to ensure the transport network can accommodate the proposed level of growth. • The separate South East Warrington Employment Area policy states that employment development will not be commenced until the funding and the programme for delivery of improvements at Junction 20 of the M6 have been agreed with key stakeholders, including Highways England and the Local Highway Authority. Additional infrastructure improvements required by the allocation policy will ensure that HGV traffic is able to efficiently access the motorway. As such, the Council is confident that HGV traffic will not have a detrimental impact on existing and future residential areas in south Warrington.

Policy MD3 - South West Urban Extension	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Objection to the loss of Green Belt as no exceptional circumstances have been justified. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The housing figures are based on incorrect demographic figures and exaggerated growth expectations. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The policy says about 1,600 houses this should be more specific on the numbers. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Walton village will lose its character and be swamped by housing 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The housing will not be affordable and will be for commuters 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The whole of south Warrington with the housing allocations will be an urban sprawl 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • There has been a lack of consideration of brownfield sites including Fiddlers Ferry Power Station (FFPS) that will close in 2020. 	<ul style="list-style-type: none"> • Fiddlers Ferry Power Station is included as an allocation site in the updated PSVLP (2021).
<ul style="list-style-type: none"> • Infrastructure measures and unclear and costs are underestimated. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The proposed Western link Road is not sufficient to support the additional demand that will exacerbate rat running through the adjoining areas. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The historic character of Walton Village will be undermined. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
MP, Local Borough, Town or Parish Councillor (9):	
<ul style="list-style-type: none"> • Objection to the loss of Green Belt in this area as no exceptional circumstances have been justified 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The removal of land from the Green Belt for housing for this allocation will reduce the gap (to 250 metres) significantly between Walton and the neighbouring areas of Moore in Halton this is contrary Green Belt policy. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.

Policy MD3 - South West Urban Extension	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The policy says about 1,600 houses this should be more specific, there are also no indications of tenure mix and provision of affordable housing. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The plan does not provide a comprehensive package of infrastructure which is needed to support the allocation. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The viability of the proposals and allocation have not been tested against the infrastructure costs. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The allocation does not consider the Control of Major Accident Hazards (COMAH) zones and how these impact on housing and industrial development. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • There are no policies set out for the natural environment within the area. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The proposals will significantly undermine the historic assets of Walnut Tree Farm and Grange Manor Farm. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The Heritage Impact Assessment for Walton Village has not been signed off by English Heritage. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
Landowner/Developer	
<ul style="list-style-type: none"> • Support for the allocation 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The allocation can support 1800 homes (rather than 1600) on 53 hectares with an associated allocation of 53 acres for Public Open Space, Green Infrastructure, community and education provision. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The development can fully support a 30% level of affordable housing including a mix of tenure types. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Support for residential care home provision but there is a need for a detailed assessment of what the requirement for bed spaces is. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Deletion of the requirement of custom build plots in the policy as this is dealt with in policy DEV2. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.

Policy MD3 - South West Urban Extension	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Clarification on densities in particular on those that can be achieved in areas near the town centre urban areas and the proposed local centres, suggested that these areas can take 30dph 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The policy allocation does not provide sufficient justification for the provision of additional secondary school places, the playing pitches requirement and leisure facilities required. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Policy should allow for adjacent Green Belt land to be used for uses associated with the allocation such as public open space and drainage 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Funding is not clear for the Western Link and contributions from various sources should be clarified. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Part 45 on the historic environment is not in accordance with national planning guidance and Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas Act 1990), since it requires a positive improvement and enhancement to the historic setting and environment of heritage assets. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Clarity is required on the meaning of low carbon in the policy. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Part 22(a) requires delivery of a minimum of 10.30ha of open space, comprising 2.02ha of informal play space; 7.36ha of natural/semi-natural green space and 0.47ha of allotments, and 0.92ha of equipped play. The overall requirement of 10.3ha is more than the sum of the component parts (9.85ha). 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • A number of detailed modifications are suggested to the policy to make it flexible and in line with NPPF guidance. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Technical highway work suggests some of the housing allocation can be delivered in advance of the Western link road being in place 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • The allocation is uncertain with regard to the infrastructure required to support the allocation therefore the plan should allocate more sites and safeguarded land to meet housing requirements. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.

Policy MD3 - South West Urban Extension	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The lead in times for the site will not allow the housing trajectory to be met therefore other sites should be allocated to support housing needs. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England supports the policy and considers the Council can justify the development with regard to its impact on the historical environment with its Heritage Impact Assessment (HIA). 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Amendments suggested to Part 45 to 48 by Historic England that would strengthen the reference to the HIA and make any proposals that come forward meet with its recommendations. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Highways England support the approach set out for delivering the site allocation in Policy MD3, as this will ensure that alternative sustainable transport options are made available in the right place at the right time to cater for local trips and forecast demand associated with planned development. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Highways England recognise that a key element of identified assessment work was to test the proposed site allocations through the updated Warrington MMTM. However, a robust transport evidence base would include an assessment of the impact of the Local Plan upon the SRN to ensure that appropriate mitigation measures are proposed and delivered to support sustainable development. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • United Utilities recommend a number of amendments to the wording of Parts (5) and (40) of the policy so as to achieve a sustainable and holistic drainage strategy and ensure that there is unfettered access to assets. • United Utilities would like to see impact statements and construction plans submitted prior to development to ensure no disruption or impact on existing facilities required by the policy. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Cheshire West and Chester (CW&C) and Cheshire East have raised concerns on of the impact of development on the strategic motorway network (M6 junctions 19 and 20; the M56 Junction 10 and the M56/M6 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.

Policy MD3 - South West Urban Extension	
Summary of Issues Raised	Response
interchange) together with the impact on adjacent local roads. More transport modelling is called for plus associated improvements.	
Other	
<ul style="list-style-type: none"> • Warrington and Halton Green Party are concerned that the allocation will change the character and distinctiveness of the area 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust consider that the brief policy guidance relating to the natural environment for this proposed allocation is wholly inadequate as it fails to address the following: <ul style="list-style-type: none"> ○ Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019). This should be reflected in the policy for this allocations (i.e. <i>A measurable net gain in biodiversity should be demonstrated through the use of the Defra Net Gain metric</i>). ○ This allocation supports several areas of habitat of principal importance including ponds and semi-natural woodland (for example south of Grange Mill House in the SWUE). The mature native hedgerows, many of which contain mature trees, within the site are also classified as habitats of principal importance. In order to comply with policy DC4 and paragraph 174b of the NPPF habitats of principal importance (priority habitats) must be avoided, mitigated for, or as a last resort compensated for (ie. the mitigation hierarchy must be shown to have been applied). ○ The allocation contain mature individual trees and no guidance has been provided on how these should be avoided where possible. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.

Policy MD3 - South West Urban Extension	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The National Self Build Association are encouraged by the policy which supports the allocation of plots for self-build properties but are concerned that supply will not meet demand. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Residents of neighbouring areas are concerned that the release of Green Belt will narrow the division between Walton and Moore village 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Residents of neighbouring areas believe that the housing figures are unjustified and that the development will erode the existing character of the locality especially the village of Moore. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.
<ul style="list-style-type: none"> • Residents of neighbouring areas believe the plans will cause urban sprawl and congestion. 	<ul style="list-style-type: none"> • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension.

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
<p>Residents (Note: Peel Hall petition received that will be reported in the Report of Consultation as one petition signed by 968 residents, requesting Peel Hall be removed from the PSVLP (2019). The key issues from the petition are included in this schedule.)</p>	
<ul style="list-style-type: none"> Peel Hall should be removed from the Plan as due to constraints, it is undeliverable and not developable, as evidenced by the recent planning appeal decision. The site is landlocked and there are no suitable mitigation measures available for example to mitigate the impacts on infrastructure, the road network, noise, wildlife and air quality (given the site's proximity to two AQMAs). 	<ul style="list-style-type: none"> The Peel Hall site is a large strategic site within the existing urban area and is considered to be acceptable in principle for residential development, subject to any identified harm being mitigated. Following the Planning Inspectorate appeal decision to refuse planning permission and acknowledging there is currently no agreed package of mitigation measures, the Peel Hall site was reclassified in the Council's SHLAA from 'deliverable' to 'developable'. Whilst it is acknowledged that due to a legal challenge a second Public Inquiry has now taken place, and the decision is still awaited, it is still the Council's position that the site is considered to be 'developable', but not deliverable with regards to the Council's SHLAA.
<ul style="list-style-type: none"> Local Plan Policy is written as a mirror image of what was proposed through the refused planning application and appeal. The policy, as written, will not mitigate the impacts of this proposed development. 	<ul style="list-style-type: none"> Policy MD4 contains safeguards to ensure that the required supporting infrastructure is provided and mitigation measures are secured to mitigate the impacts of the proposed development.
<ul style="list-style-type: none"> This site represents 30 years of unsuccessful planning attempts that have been battled by local residents. 	<ul style="list-style-type: none"> Comments are duly noted and it is acknowledged that the site has a history of planning matters related to planning applications, planning appeals and Local Plan Inspector's Reports, covering a period of time.
<ul style="list-style-type: none"> Relocation of the Mill Land Playing fields over 1km away is not acceptable for local residents. 	<ul style="list-style-type: none"> The relocation of the existing Mill Lane Playing fields to Council owned land, to the south of the Peel Hall site at Windermere Avenue would create a sustainable and functional solution to providing access to a 'Sporting Hub' for the existing and new residents of north Warrington.
<ul style="list-style-type: none"> Site should be removed from the Council's SHLAA, as it is not considered to be developable. 	<ul style="list-style-type: none"> The site is a large strategic site within the existing urban area and therefore needs to be included in the Council's housing land supply (SHLAA). Development is dependent on the provision of supporting infrastructure where it can be demonstrated that development will not have a detrimental impact on the local and strategic road network and on

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
	air quality. Therefore, given these requirements, the site is not included in the Council's 5 year supply.
<ul style="list-style-type: none"> The Peel Hall site is the last remaining green space/green lung in north Warrington and should not be developed. 	<ul style="list-style-type: none"> The Peel Hall site is not designated as Green Belt or a protected open space. Policy MD4 will secure extensive recreation and open space provision across the site, whilst also protecting the existing natural features of the site. This will include for example the delivery of a new Park and open spaces, areas for Children's play, additional playing pitches and the protection of Radley Plantation.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> Peel Hall should be removed from the Plan as due to constraints, it is undeliverable and not developable, as evidenced by the recent planning appeal decision. The site is landlocked and there are no suitable mitigation measures available for example to mitigate the impacts on infrastructure, the road network, noise, wildlife and air quality, given the site's proximity to two AQMAs.. 	<ul style="list-style-type: none"> The Peel Hall site is a large strategic site within the existing urban area and is considered to be acceptable in principle for residential development. Following the Planning Inspectorate appeal decision to refuse planning permission and acknowledging there is currently no agreed package of mitigation measures, the Peel Hall site was reclassified in the Council's SHLAA from 'deliverable' to 'developable'. Whilst it is acknowledged that due to a legal challenge a second Public Inquiry has now taken place, and the decision is still awaited, it is still the Council's position that the site is considered to be 'developable', but not deliverable with regards to the Council's SHLAA.
<ul style="list-style-type: none"> The Peel Hall site is the last remaining and treasured green space/green lung in north Warrington and should not be developed. 	<ul style="list-style-type: none"> The Peel Hall site is not designated as Green Belt or a protected open space. Policy MD4 will secure extensive recreation and open space provision across the site, whilst also protecting the existing natural features of the site. This will include for example the delivery of a new Park and open spaces, areas for Children's play, additional playing pitches and the protection of Radley Plantation.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> The Peel Hall site, located within the existing urban area and not designated as Green Belt, is capable of 'delivering' new housing in the first 5 years of the Plan period. The SHLAA should be amended to reflect 	<ul style="list-style-type: none"> Following the Planning Inspectorate appeal decision to refuse planning permission and acknowledging there is currently no agreed package of mitigation measures, the Peel Hall site was correctly classified in the Council's SHLAA from 'deliverable' to 'developable'.

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
<p>this fact, and the site classed as 'deliverable', as the site is suitable, available and achievable.</p>	<ul style="list-style-type: none"> • Whilst it is acknowledged that due to a legal challenge a second Public Inquiry has now taken place, and the decision is still awaited, it is still the Council's position that the site is considered to be 'developable', but not deliverable with regards to the Council's SHLAA.
<ul style="list-style-type: none"> • It is proposed that the wording in the proposed submission version Local Plan 2019 associated with the Peel Hall site should be changed, so that by the end of the first five years (2023): <ul style="list-style-type: none"> ○ Up to 40 dwellings can be accessed from Blackbrook Avenue. ○ Up to 100 dwellings and a 100 bedroom care home can be accessed from Poplars Avenue. ○ Up to 100 dwellings can be accessed from Mill Lane. ○ Up to 20 dwellings can be accessed from Birch Avenue. 	<ul style="list-style-type: none"> • Following the Planning Inspectorate appeal decision to refuse planning permission and acknowledging there is currently no agreed package of mitigation measures, the Peel Hall site was correctly classified in the Council's SHLAA from 'deliverable' to 'developable'. • Whilst it is acknowledged that due to a legal challenge a second Public Inquiry has now taken place, and the decision is still awaited, it is still the Council's position that the site is considered to be 'developable', but not deliverable with regards to the Council's SHLAA.
<ul style="list-style-type: none"> • Support the Local Plan allocation to deliver 1,200 new homes in the 'urban area', within the Plan period. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • The Policy is too long and overly detailed, with the proposals for Peel Hall being negatively phrased when compared to other site allocations in the Plan, allocations that are to be removed from the Green Belt. 	<ul style="list-style-type: none"> • Policy MD4 is a 'Strategic Policy' to set out an overall strategy for the pattern, scale and quality of development, therefore providing enough detail, certainty and clarity, so it is evident how a decision maker should react to development proposals.
<ul style="list-style-type: none"> • The policy should refer to a "minimum of 1,200 new homes" to add clarity and be positively prepared. 	<ul style="list-style-type: none"> • Comments noted, but do not agree. However, the policy has been amended to refer to 'up to', rather than a minimum.
<ul style="list-style-type: none"> • The Peel Hall site has an already agreed package of social and community benefits set out in a S106 agreement, the policy seeks to go beyond this (with no change in circumstances to justify the change). This should be re-assessed. 	<ul style="list-style-type: none"> • The policy requirements reflects discussions with all the relevant Council service providers and therefore the Council's latest policy requirements.
<ul style="list-style-type: none"> • Question the deliverability of this allocation and its inclusion within the Local Plan following the Secretary of State's decision letter (December 2018). It is unclear what, if anything, has changed since this decision to demonstrate that the site is deliverable. Concerns regarding this 	<ul style="list-style-type: none"> • Following the Planning Inspectorate appeal decision to refuse planning permission and acknowledging there is currently no agreed package of mitigation measures, the Peel Hall site was reclassified in the Council's SHLAA from 'deliverable' to 'developable'.

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
<p>proposed allocation relating to the impact that this site may have on the effectiveness of the plan overall.</p>	<ul style="list-style-type: none"> • Whilst it is acknowledged that due to a legal challenge a second Public Inquiry has now taken place, and the decision is still awaited, it is still the Council's position that the site is considered to be 'developable', but not deliverable with regards to the Council's SHLAA. • Development in principle is accepted on this none Green Belt site within the existing urban area; however, mitigation measures are needed to allow the site to come forward for development.
<ul style="list-style-type: none"> • Supportive of the requirement to replace Mill Lane playing fields. 	<ul style="list-style-type: none"> • Comments duly noted.
Statutory Consultees	
<ul style="list-style-type: none"> • Highways England: Support the approach set out for delivering the site allocation in Policy MD4, as this will ensure that alternative sustainable transport options are made available in the right place at the right time to cater for local trips and forecast demand associated with planned development. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Highways England: A robust transport evidence base would include an assessment of the impact of the Local Plan upon the SRN to ensure that appropriate mitigation measures are proposed and delivered to support sustainable development. 	<ul style="list-style-type: none"> • To support the Council's Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development of the SRN, and the LRN. The Council will continue to work closely with Highways England to ensure that mitigation measures are identified to address any impacts on the SRN. Post the PSVLP consultation, the Council has provided additional requested transport evidence to Highways England, who will be a signatory to the Council's Statement of Common Ground.
Other	
<ul style="list-style-type: none"> • The allocation incorporates Radley Plantation and Pond Local Wildlife Site which supports priority habitat and priority species. The site should be excluded from the allocation in order to comply with the emerging Warrington policies and the NPPF. 	<ul style="list-style-type: none"> • The sites are afforded protection by virtue of the requirements of Policy MD4.

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The LWS should be protected by a buffer to help prevent damage caused by polluted water runoff, light pollution, disturbance, the spread of invasive garden species and predation by domestic pets. We suggest a minimum buffer of 15m to protect the site is secured. 	<p>The sites are afforded protection by virtue of the requirements of Policy MD4.</p>
<ul style="list-style-type: none"> • Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this site. 	<ul style="list-style-type: none"> • Agree. Policy MD4 of the Updated PSVLP (2021) has been amended to strengthen the policy requirement to secure Biodiversity Net Gain.

Policy OS1 - Burtonwood	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Significant amount of objection to the allocation from local residents for the following reasons: • Burtonwood borders with St Helens and its parish of Bold. There is currently plans to build thousands of homes in Bold. This will have a major impact on Burtonwood in terms of increased traffic congestion. Adding more to houses to the village is only going to add to this congestion. • Concern that the scheme will be the start of further expansion and the fields between Green Lane and Collins Green will be next – creating exactly what the Green Belt is designed to protect against – urban sprawl. • There is no justification for the proposed growth in housing in Burtonwood • There are brownfield sites available for development, such as Fiddlers Ferry Power Station (FFPS) and Omega. FFPS will be closing completely by 03/2020 but the Local Plan does not consider this. The FFPS site is large enough to accommodate a large residential extension. • The proposed housing would not satisfy the local need for affordable housing in Burtonwood. • There are significant highway safety issues. The roads into and out of Burtonwood are narrow, winding and in the main without footpaths. There is already traffic congestion on Phipps Lane and Green Lane, particularly at school drop-off and pick-up times. There have been numerous accidents and traffic volumes have increased due to new development in neighbouring areas. The proposals will make the situation a lot worse, causing highway safety issues outside of the Primary School. 160 new homes will generate 320 more cars on the road at peak times. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.

Policy OS1 - Burtonwood	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The local facilities and services (Schools, GP practices) cannot accommodate the increase in population that will be created. • It will impact on wildlife habitat and productive agricultural land. Creatures currently found on and around the threatened green belt land in Burtonwood include: Mammals (at least 9 species are known to exist in and around the fields in question; Amphibians (critically endangered ones only) Common Frog; Common Toad; Great Crested Newt; Birds (over 50 species have been recorded in or above the green belt land earmarked for development in Burtonwood). • It will increase air pollution. Warrington already has a poor record on air pollution. • The site is prone to flooding and subsidence. There has been regular surface water flooding on Phipps Lane and Broad Lane with the existing drainage unable to cope with any remotely heavy rainfall. The Environment Agency surface water flooding maps show several high-risk points on the aforementioned roads and also in the middle of the proposed development site. Building on the proposed site will remove considerable natural drainage, including culverts that are on the proposed site and move flooding problems elsewhere (ie. Rushton Cl, Phipps Ln or Broad Ln). • The electrical infrastructure/broadband is does not have the capacity to meet the current demands of the population of Burtonwood • The duty to cooperate has not been fully complied with as any new development in Burtonwood will have to compete alongside the 3000 new dwellings proposed at New Bold (Sutton) in St Helens draft Local Plan which is only a kilometre away across the border. This has not been factored in to any of the calculations or assessments undertaken in the site selection process. 	

Policy OS1 - Burtonwood	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Local residents have not been consulted properly or given sufficient time to create an ACTION group and to present a cohesive and comprehensive list of objections. It is not clear what the extent of the allocated site is. 	
<ul style="list-style-type: none"> General support for the allocation from a small number of residents. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> Support from Local Cllr for the provision within the proposed policy to build affordable housing for elderly/disabled people 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<ul style="list-style-type: none"> Concerns raised by Local Cllr regarding a number of issues: <ul style="list-style-type: none"> The proposals do not take into account the plans of the neighbouring authority of St. Helens to build 4000 homes by Gorse Lane in Burtonwood. The developers should take responsibility to mitigate negative impacts caused from traffic as a result of the 4000 proposed homes near Gorse Lane in Burtonwood. They are concerns about additional traffic generation on Green Lane, which is narrow; has a blind bend and has a school located opposite the site. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.

Policy OS1 - Burtonwood	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> ○ The Council should provide figures on the maximum projection of dwellings in the proposed allocation as opposed to minimum figures which would create undesirable development opportunities in future and result in the loss of more greenspace. ○ The policy should ensure that vegetation, water courses and wildlife habitats are protected and preserved through screening and enhancement measures. 	
Landowner/Developer	
<ul style="list-style-type: none"> ● Strong support from the developer whose site is proposed to be allocated by Policy OS1. 	<ul style="list-style-type: none"> ● The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<ul style="list-style-type: none"> ● A number of detailed modifications are suggested, in summary these are: <ul style="list-style-type: none"> ○ Amend wording of paragraph 10.5.2 of the supporting text to indicate that the first homes are anticipated to be completed in 2022/23 not 2021/22. ○ Amend wording of paragraph 10.5.5 of the supporting text to specify that any contributions towards infrastructure will only be secured subject to a viability appraisal. 	<ul style="list-style-type: none"> ● The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<ul style="list-style-type: none"> ● There is one developer who considers that the site proposed to be allocated by Policy OS1 is not the most suitable site and that there is an alternative site that is more suitable: <ul style="list-style-type: none"> ○ Brooklyn Ltd object to the proposed removal and subsequent allocation for housing of land to the north of Burtonwood. The site lies in an area that is not well linked to the main urban area of Warrington nor the employment at Omega. The location of the site does not sit well at all with the aim of paragraph 10.5.1. To the 	<ul style="list-style-type: none"> ● The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.

Policy OS1 - Burtonwood	
Summary of Issues Raised	Response
<p>contrary it will lead to increased use of the car, reduce the likelihood of sustainable travel, and lead to increased congestion in the centre of the village.</p> <ul style="list-style-type: none"> ○ Brooklyn Ltd consider that their land to the south of Burtonwood (Clay Lane), is closer to Warrington and Omega, with pedestrian and cycle links being improved by the Council at the current time. Thus the opportunities for sustainable travel modes are far greater than the proposed site (OS1). In Green Belt terms the Clay Lane site is far better placed for a development, resulting in less harm to the green belt than the land to the north. The Green Belt study and the site selection process that flows from that study are flawed in approach and must be revisited in a re-appraisal of the plan. 	<ul style="list-style-type: none"> ● Given these issues the updated PSVLP is not proposing to allocate an alternative site in Burtonwood.
<ul style="list-style-type: none"> ● Satnam Millennium Ltd consider that all the development north of M62 will put additional pressure onto J9 of the M62 and that this must be taken into account in any mitigation scheme agreed for the M62 junction 9. The plan should set out the requirement for a mechanism for the non-green belt site at Peel Hall and these sites to share the costs of that mitigation scheme. 	<ul style="list-style-type: none"> ● The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<ul style="list-style-type: none"> ● A developer supports the principle of the need for the allocation of sites within outlying settlements. However, it is considered that the amount of housing proposed within these outlying settlements is not sufficient and further land release is required, including in Burtonwood. The reason for this is: <ul style="list-style-type: none"> ○ Currently less than 6% of the Borough's overall Plan period housing requirements will be delivered within the outlying settlements. This is too low. 	<ul style="list-style-type: none"> ● The Council considers that the outlying settlements make an appropriate contribution to meeting the Borough's development needs, as set out in the Spatial Strategy of the updated PSVLP (2021).
Statutory Consultees	
<ul style="list-style-type: none"> ● St Helens Council noted that the site in Burtonwood is close to employment areas at Bold and in Newton-le-Willows (both of which are 	<ul style="list-style-type: none"> ● The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the

Policy OS1 - Burtonwood	
Summary of Issues Raised	Response
<p>in St Helens Borough) and suggested that it would be beneficial if the policy gives wider consideration to the cycle network in this area.</p>	<p>uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.</p>
<ul style="list-style-type: none"> • Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment subject to a few minor amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk. A couple of detailed modifications are suggested, in summary these are: <ul style="list-style-type: none"> ○ Paragraph 19 should be amended to read: “Development will be required to preserve and enhance the <u>historic environment, heritage assets and their setting</u>”. It is recommended that Bullet 20(a) is deleted entirely to ensure that it is consistent with the NPPF and the content of the HIA. The suggested change to Para 21 would mean there is no need to include additional detail 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<p>Other</p>	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust advise that the mature native hedgerows, many of which contain mature trees, within this site are also classified as habitats of principal importance. In order to comply with proposed 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is

Policy OS1 - Burtonwood	
Summary of Issues Raised	Response
<p>Policy DC4 and paragraph 174b of the NPPF habitats of principal importance (priority habitats) must be avoided, mitigated for, or as a last resort compensated for i.e. the mitigation hierarchy must be shown to have been applied. Where an allocation contains mature trees, no guidance has been provided on how these should be avoided where possible.</p>	<p>proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.</p>
<ul style="list-style-type: none"> • The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<ul style="list-style-type: none"> • A number of visitors to Burtonwood and residents from surrounding areas have expressed concerns that Burtonwood and Collins Green do not have the road infrastructure to support the level of development proposed. Green Lane is already congested, in particular with school traffic. 160 new homes will generate 320 more cars on the road at peak times. Concerned about gridlock on roads and increased air pollution. There does not appear to have been an assessment of traffic movement on Green Lane/Phipps Lane. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<ul style="list-style-type: none"> • Petition (189 signatures) raising a number of issues: <ul style="list-style-type: none"> ○ Failure to involve the community directly affected by the proposed removal of Green Belt land in Burtonwood. As part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Failure by the Council to take all 	<ul style="list-style-type: none"> • The Council carried out extensive consultation on the PSVLP (2019) in accordance with statutory requirements and the Council's Statement of Community Involvement.

Policy OS1 - Burtonwood	
Summary of Issues Raised	Response
reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI.	

Policy OS2 – Croft (now Policy OS1 in the updated PSVLP)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The site at Croft (OS2) is not sustainable in any way due to lack of facilities and transport options and should be removed as the local site and a new site found. 	<ul style="list-style-type: none"> Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity. The development will be expected to provide minimum open space/equipped play in line with Council standards.
<ul style="list-style-type: none"> The infrastructure and public services would not support the volume of housing proposed. The villages has limited services, there are no retail or employment opportunities. Croft school is at full capacity and over-subscribed, with little scope to extend without building on more Green Belt. 	<ul style="list-style-type: none"> See above. The site has easy access to existing local services in Croft and to employment areas at Winwick Quay and Birchwood Park.
<ul style="list-style-type: none"> The development of housing will have an impact upon surrounding properties in terms of loss of light, openness and overlooking. 	<ul style="list-style-type: none"> These detailed design issues will be assessed at the planning application stage. All development will be expected to meet Policy ENV8 (Environmental and Amenity Protection), Warrington’s adopted design guidance and reflect a low density of development (30 dwellings per hectare).
<ul style="list-style-type: none"> The planning report that was prepared by HOW states that there is already high vehicular activity from the site due to the existing livery use in an attempt to suggest that the proposed development would not constitute an increase in traffic. The same report suggests that 75-90 homes would mean a reduction in traffic which is a misrepresentation and gross underestimation. 	<ul style="list-style-type: none"> To support the Council’s Local Plan, a new transport model has been developed. The Warrington Multi Modal Transport Model (WMMTM) (2021) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable.
<ul style="list-style-type: none"> The local road network is already congested, particularly in peak hours and could not cope with the additional traffic generated by this proposal. In addition pavements are narrow and blocked with overgrown vegetation (in particular Lord Street and Mustard Lane) and provision for cyclists is poor. 	<ul style="list-style-type: none"> See above. As part of the provision transport measures cycling and walking routes will be required to connect with existing networks.

Policy OS2 – Croft (now Policy OS1 in the updated PSVLP)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Access to/from the site is very poor. Deacon Close currently has inadequate provision for car parking, vehicles are parked either side of the road, increased traffic movements will exacerbate the problem. Sight lines at Abbey close/Lord Street is inadequate. Traffic turning into Abbey Close from Lord Street would be in a dangerous position due to traffic approaching from Culcheth and the limited sight line towards that side due to the bend. At the same time, it is difficult for cars to pass on Lord St due to the width of the road. The footpaths on Lord Street are below standard width and unsafe for primary school children that are crossing it. 	<ul style="list-style-type: none"> • To support the Council’s Local Plan, a new transport model has been developed. The Warrington Multi Modal Transport Model (WMMTM) (2021) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. The policy requires the development to provide a full Transport Assessment and transport improvements for the site.
<ul style="list-style-type: none"> • There is a drainage ditch which regularly floods along the site boundary. Development of the site will cause flooding of existing adjacent properties. 	<ul style="list-style-type: none"> • Parts 16 and 17 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
<ul style="list-style-type: none"> • Public transport links to/from the village are very poor with only a limited bus service and no train stn. Consequently, residents are reliant on vehicles. 	<ul style="list-style-type: none"> • Part 14 and 15 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development.
<ul style="list-style-type: none"> • The Policy is unsound as it will cause the loss of Green Belt. The Council’s assertion that Green Belt release in the outlying settlements will increase housing choice and support local services is not evidenced. 	<ul style="list-style-type: none"> • The Council has considered a range of alternatives for Green Belt release including a more release around settlements, this was considered harder to deliver and mitigate for the impacts on infrastructure. The majority of new housing is in large Green Belt release that bring with it corresponding amounts of new and improved infrastructure. The release in this circumstance will be circa 75 homes which can be supported through existing facilities and services and through supported improvements from the development. Assessment of the site showed it performed well against the objectives of the Plan and The NPFF.
<ul style="list-style-type: none"> • Croft Parish Plan (2018) identified a number of actions that villagers hoped would be taken into consideration during the preparation of the emerging Local Plan (Actions 1, 14 and 15). 99% of those surveyed felt that protecting the Green Belt and Countryside was a very important 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement. The site’s northern, eastern and southern boundaries of the site will define the Green Belt and the development will be expected to reinforce these boundaries and give long term protection to the Green Belt in this location.

Policy OS2 – Croft (now Policy OS1 in the updated PSVLP)	
Summary of Issues Raised	Response
<p>factor to Croft’s future, therefore, these resident’s views must be listened to.</p>	
<ul style="list-style-type: none"> • Wildlife habitats will be destroyed by development. This particular location is very close to a group of Buzzards that have been nesting in the area for many years. 	<ul style="list-style-type: none"> • Policy DC4 seeks to protect priority species and habitats on development sites and achieve a net gain in biodiversity in line with section 40 of the Natural Environment and Rural Communities Act and the NPPF (2021 update) which indicates that in delivering sustainable development local authorities should enhance as well as protect biodiversity and natural habitats.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • Croft and Culcheth Parish Council’s contest the outcome of the Green Belt Assessment and consider that the site makes a major contribution to Green Belt purposes. The Assessment suggests that parcel CR4 makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to one, and no contribution to two giving a Moderate contribution overall. This is the same assessment as parcel CR5, which comes out with a ‘Strong Contribution’. Only subjectivity could explain why CR4 has not been given a ‘Strong Contribution’ too, and it is considered that the assessment should be reviewed and uprated. 	<ul style="list-style-type: none"> • In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The parcels were both assessed in accordance with the methodology but because different parcels of land contain different features this can give rise to different results.
<ul style="list-style-type: none"> • Croft and Culcheth Parish Council’s oppose the allocation on the basis that no evidence has been provided to suggest that further houses in Culcheth from a national volume house builder would neither increase housing choice nor support the vitality and viability of local services. 	<ul style="list-style-type: none"> • The policy specifically details the requirement to provide a range of housing tenures, types and sizes (Part 2); and the provision of 30% affordable housing (Part 3). The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches/primary care capacity and the delivery of a minimum open space/equipped play in line with Council standards (Parts 8 and 9).
<ul style="list-style-type: none"> • Croft is a small community with limited facilities. Croft has poor public transport links. It has a poor and declining bus service meaning the area is not a sustainable one to expand. Croft is not near a rail station and using Birchwood or Padgate stns would inevitably mean additional car journeys. Local roads are busy and in practice almost all trips from or to the site would inevitably be car-based. 	<ul style="list-style-type: none"> • Parts 14 and 15 of the policy require a package of transport improvements to support the development including pedestrian links to existing bus services which the development can support and walking and cycling routes.

Policy OS2 – Croft (now Policy OS1 in the updated PSVLP)	
Summary of Issues Raised	Response
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • There is strong support from the developer whose site is proposed to be allocated by Policy OS2 (now Policy OS1 in the updated PSVLP). 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • A number of developers support the principle of the need for the allocation of sites within outlying settlements. However, it is considered that the amount of housing proposed within these outlying settlements is not sufficient and further land release is required, including in Croft. The reasons for this, are: <ul style="list-style-type: none"> ○ currently less than 6% of the Borough’s overall Plan period housing requirements will be delivered within the outlying settlements. This is too low; and ○ The Plan should include a flexibility of 20% rather than 10%. This would require the allocation of additional land for 750 homes in the outlying settlements of which Croft should accommodate an additional 52 homes (7%). 	<ul style="list-style-type: none"> • The Council has considered a range of alternatives for Green Belt release including a more dispersed release this was considered harder to deliver and mitigate due to the impacts on infrastructure. The majority of new housing is in large sites to be released from the Green Belt that bring with them corresponding amounts of new and improved infrastructure. • The Council considers that 10% provides sufficient flexibility for the housing land supply. Release above this limit in the outlying settlements will undermine the spatial strategy; impact on regeneration plans and undermine the maximisation of urban sites and their capacity to deliver new homes.
<ul style="list-style-type: none"> • A number of detailed modifications are suggested, in summary these are: <ul style="list-style-type: none"> ○ Part 4 of Policy OS2 should be amended as the Council’s self-build register only shows a very limited need for self-build plots, which does not justify provision being sought on all allocated housing sites. There is a need for the smaller housing sites such as Croft to deliver housing quickly so that the Council can demonstrate a 5-year supply; ○ Any methodology used under Part 9 of Policy OS2 in relation to calculating financial contributions for playing pitches and indoor facilities should not threaten the viability and/or deliverability of the site; ○ Part 14 of Policy OS2 should be amended as the site is in Flood Zone 1 and has a very low risk of flooding (less than a 0.1% chance (1 in 1000)). Therefore ‘flood alleviation methods’ is 	<ul style="list-style-type: none"> • The Council’s Self-build & Custom Housing Register identifies a significant need for people wishing to commission or build their own homes (self and custom-build properties). In line with Policy DEV2 and paragraph 62 of the NPPF the Council has identified the major allocations as areas where there is available land in accessible and sustainable locations to help meet this need. • The Council has undertaken the preparation of a full revised Local Plan Viability Assessment (2021), which has reviewed all infrastructure requirements and costs for each of proposed allocations. Having undertaken this work the Council is confident that the necessary infrastructure is capable of being delivered. Nevertheless the Council has modification Policy INF5 in the updated PSVLP to ensure sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly

Policy OS2 – Croft (now Policy OS1 in the updated PSVLP)	
Summary of Issues Raised	Response
<p>not an appropriate term given that flooding is a low risk on this site; and</p> <ul style="list-style-type: none"> ○ Part 15 of Policy OS2 should be amended as there are no utilities constraints on the site. 	<p>demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought.</p> <ul style="list-style-type: none"> ● The site borders on an 8 metre buffer zone for a non-main river and is in proximity to development which has an interim surface water risk which will need some consideration. In line with government guidance some measure may not be necessary now but maybe in the future and there maybe need to consider whether a managed adaptive approach might be appropriate for development in this location. ● There is an expectation that surface water and foul water will be discharged separately, with only foul water being discharged to the public sewer.
<ul style="list-style-type: none"> ● There are some developers who consider that the site proposed by Policy OS2 is not the most suitable site and that there are alternative sites that are more suitable, these are identified as omitted sites with most representations regarding the Green Belt Assessment of sites and housing requirement. 	<ul style="list-style-type: none"> ● In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The assessment considered the contribution that larger General Areas, individual parcels adjacent to the main urban area and inset settlement boundaries and development sites promoted through the ‘call for sites’ all made to Green Belt criteria.
<ul style="list-style-type: none"> ● Satnam Millennium Ltd consider that all the development north of M62 will put additional pressure onto J9 of the M62 and that this must be taken into account in any mitigation scheme agreed for the M62 junction 9. The plan should set out the requirement for a mechanism for the non-green belt site at Peel Hall and these sites to share the costs of that mitigation scheme. 	<ul style="list-style-type: none"> ● Part 14 (c) of the policy allows for necessary network improvements as identified by a Transport Assessment. Highways England are responsible for the motorway network and any advice from them will be taken into consideration.
Statutory Consultees	
<ul style="list-style-type: none"> ● None. 	<ul style="list-style-type: none"> ●
Other	
<ul style="list-style-type: none"> ● Cheshire Wildlife Trust (CWT) consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been 	<ul style="list-style-type: none"> ● The Natural Environment section of the policy (Part 11) requires a scheme for measurable biodiversity net gain to be demonstrated using the Defra Metric in accordance with the requirements in Policy DC4.

Policy OS2 – Croft (now Policy OS1 in the updated PSVLP)	
Summary of Issues Raised	Response
<p>mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation.</p>	
<ul style="list-style-type: none"> • CWT advise that the mature native hedgerows, many of which contain mature trees, within this site are also classified as habitats of principal importance. In order to comply with proposed Policy DC4 and paragraph 174(b) of the NPPF habitats of principal importance (priority habitats) must be avoided, mitigated for, or as a last resort compensated for i.e. the mitigation hierarchy must be shown to have been applied. Where an allocation contains mature trees, no guidance has been provided on how these should be avoided where possible. 	<ul style="list-style-type: none"> • Part 10 of the policy make reference to taking account and reinforcing existing hedgerows and trees along the site boundaries. Whilst, Part 11 of the policy makes reference to the need for the development to assess the impacts on Priority Species and Habitats through the application of the mitigation hierarchy in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> • The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites. 	<ul style="list-style-type: none"> • Support noted. • WBC maintain a register of individuals and groups, who are seeking to acquire serviced plots of land in the authority’s area in order to build houses for those individuals to occupy as homes, as required by the Self-build and Custom Housebuilding Act 2015.

Policy OS3 – Culcheth (now Policy OS2 in the updated PSVLP)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The infrastructure and public services would not support the volume of housing proposed. The schools are full, there is no Sixth Form at the High School, the Doctors' Surgery is full, parking is at a premium and the local roads are insufficient to accommodate the resultant increased volumes of traffic. With particular reference to the Culcheth site, the junction of Holcroft Lane and Warrington Road is currently extremely congested in the morning and evening rush hours due to the close proximity of the entrance to Culcheth High School to this junction. The location of the proposed additional housing on Warrington Road will make the situation far worse. Also if the construction of HS2 goes ahead and the road from Croft to Culcheth is closed, it will be even worse. Periodic closures of the surrounding Motorways for whatever reason causes the surrounding roads to become blocked with traffic. 	<ul style="list-style-type: none"> • Parts 17 and 18 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity (Parts 6, 7 and 9). The development will be expected to provide minimum open space/equipped play in line with Council standards (Part 8).
<ul style="list-style-type: none"> • Public transport links to this site are very poor with a limited bus service along Warrington Road. 	<ul style="list-style-type: none"> • See above. The site has easy access to existing local services in Culcheth and to employment areas at Winwick Quay and Birchwood Park.
<ul style="list-style-type: none"> • Concern that the local drainage infrastructure cannot cope with the additional demand created by the proposed allocation. Since the drainage system for the area was upgraded 20 plus years ago to cope with the number of dwellings at the time, many more houses have been built. Heavy rainfall affects surface water drains as enormous puddles accumulate in some areas, notably at the junction of Warrington Road and Common Lane. The junction of Lodge Drive and Ellesmere Road and Lodge Drive and Kirkby Road have more recently developed big puddles. 	<ul style="list-style-type: none"> • Parts 15 and 16 of the policy requires for the provision of appropriate drainage, sewage and flood alleviation measures including upgrading and mitigating impacts as required by United Utilities and the Environment Agency.
<ul style="list-style-type: none"> • There is no evidence of local need for 200 homes within the village and better sites are available within the borough such as around Birchwood station which is well connected by rail and bus service to the town centre and motorway network for destinations further afield. 	<ul style="list-style-type: none"> • The housing requirement is based on guidance from the government and is a whole Borough requirement and not specific to one neighbourhood. Similarly the Local Housing Need Assessment (LHNA)(2021) is based on borough wide needs including that for affordable housing which has indicated a policy need for a 30% supply on site except for the inner areas which are dominated by brown field sites that have higher costs

Policy OS3 – Culcheth (now Policy OS2 in the updated PSVLP)	
Summary of Issues Raised	Response
	<p>impacting on viability. The LHNA also indicates a need for elderly people including sheltered, extra care adaptable homes or residential care.</p> <ul style="list-style-type: none"> • The spatial policy of the Plan is to ensure that sufficient homes are delivered to support economic growth and that the type of homes delivered meet the needs of all of Warrington’s existing and future communities. It will ensure people have genuine choice in location and can remain within their local areas over time.
<ul style="list-style-type: none"> • The Policy is unsound as it will cause the loss of prime agricultural land and Green Belt. The Council’s assertion that Green Belt land is important but balance its role with the needs of the borough over the Plan period and Green Belt release in the outlying settlements will increase housing choice and support local services fly in the face of the fundamental purpose of the Green Belt. 	<ul style="list-style-type: none"> • The NPPF states that the Green Belt can only be altered in exceptional circumstances and sets out conditions prior to the consideration of any Green Belt release. In line with the NPPF Green Belt conditions the Council has through its review maximised brownfield land, optimised the density of development on town and city sites and been informed through its discussions with neighbouring authorities that they cannot accommodate Warrington’s needs. This being so, given the housing requirement of the Borough consideration of Green Belt release is necessary. • The spatial strategy for the Plan has been informed by the NPPF and has looked to provide urban extensions that promote sustainable patterns of development and modest settlement allocations that are sustainable with regard to their location, in the case of Culcheth release of a site for circa 200 homes.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • Culcheth and Croft Parish Council’s oppose the allocation on the basis that the site makes a major contribution to Green Belt purposes and that no evidence has been provided to suggest that further houses in Culcheth from a national volume house builder would neither increase housing choice nor support the vitality and viability of local services. 	<ul style="list-style-type: none"> • In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. • The policy specifically details the requirement to provide a range of housing tenures, types and sizes (Part 2); and the provision of 30%

Policy OS3 – Culcheth (now Policy OS2 in the updated PSVLP)	
Summary of Issues Raised	Response
	affordable housing (Part 3). The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches/primary care capacity and the delivery of a minimum open space/equipped play in line with Council standards (Parts 8 to 9).
<ul style="list-style-type: none"> • Culcheth and Croft Parish Council’s contest the outcome of the Green Belt Assessment. The assessment judges the site to make a moderate contribution to two Green Belt purposes, a weak contribution to one purpose, and no contribution to two purposes and therefore overall weak. Whilst, the methodology is of course subjective, it is hard to see how an area that is very open and constitutes an essential gap between settlements can be judged weak. 	<ul style="list-style-type: none"> • In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied.
<ul style="list-style-type: none"> • Culcheth and Croft Parish Council’s consider that a denser form of development would allow less land to be released from the Green Belt. The site is about 8ha, which at the 30dph minimum housing density proposed would yield 240 houses rather than the 200 suggested in OS3. The site area should be reduced to under 7ha to reflect the requirement for 30 dph. 	<ul style="list-style-type: none"> • To reflect the sites location adjacent to the open countryside a density of 30 dwellings per hectare is considered appropriate. A higher density would impact on the setting and adjacent Green Belt boundary and character of the settlement.
<ul style="list-style-type: none"> • Like Croft, Culcheth has poor public transport links. Two daytime buses per hour and a limited and declining evening and weekend service means the area is not a sustainable one to expand. Culcheth is not near a rail station and using Birchwood inevitably means additional car journeys. 	<ul style="list-style-type: none"> • Parts 17 and 18 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • There is strong support from the developer whose site is proposed to be allocated by Policy OS3. • Story Homes fully support the allocation of the Culcheth site, the majority of which comprises land which is being promoted by Story. There are no legal or ownership constraints to the delivery of housing on the site. The site is available for the delivery of housing now, it offers a suitable location for housing and Story Homes is committed to progressing a scheme as soon as the site is allocated. The site is 	<ul style="list-style-type: none"> • Support noted.

Policy OS3 – Culcheth (now Policy OS2 in the updated PSVLP)	
Summary of Issues Raised	Response
<p>therefore fully deliverable. An assessment of the environmental and technical constraints on the site has identified that there are no overriding technical or environmental constraints that would prevent it from coming forward for housing development. Storey have prepared a masterplan for the allocation as a whole and undertaken a number of technical assessments which are included as part of their submission. The site allocation boundary includes a rectangular piece of land to the north of the land being promoted by Story Homes. Story considers the inclusion of this land within the allocation boundary to be appropriate as it will allow the development potential of land to be released from the Green Belt to be maximised. This part of the allocation will be served via an existing access onto Holcroft Lane. The masterplan provided as part of the submission demonstrates that all of the allocation can be delivered as a comprehensive scheme.</p> <ul style="list-style-type: none"> ● Story Homes generally supports the provision of 30% affordable housing on the site. 	
<ul style="list-style-type: none"> ● Storey Homes considers that a number of amendments to the policy are required in order to make it sound. In summary these are: <ul style="list-style-type: none"> ○ the deletion of the requirement for the provision of self-build plots; ○ increased flexibility to allow for the provision to deliver higher minimum densities in appropriate areas of the site; ○ clarification in the policy or explanatory text as to why a contribution towards primary care is required; ○ evidence of the need for a contribution to expanding and enhancing existing or planned built leisure facilities/playing pitches/sustainable transport modes should be provided; and ○ clarification as to the size of the overall open space requirement 	<ul style="list-style-type: none"> ● The Council’s Self-build & Custom Housing Register identifies a significant need for people wishing to commission or build their own homes (self and custom-build properties). In line with Policy DEV2 and paragraph 62 of the NPPF the Council has identified the major allocations as areas where there is available land in accessible and sustainable locations to help meet this need. ● A higher density would impact on the setting and adjacent Green Belt boundary and character of the settlement. An average minimum densities of 30 dph across the whole of the site is considered to be appropriate. This will not preclude higher densities in parts of the site. ● The options assessment process took into account existing infrastructure within the main urban area of Warrington and each of the settlements and was undertaken jointly with other Council teams and partner agencies responsible for service provision. This has included the Council

Policy OS3 – Culcheth (now Policy OS2 in the updated PSVLP)	
Summary of Issues Raised	Response
	<p>teams responsible for education, parks and open spaces, transportation, culture and leisure and public health, together with the Warrington Clinical Care Commissioning Group and other NHS services operating in the borough.</p> <ul style="list-style-type: none"> • Part 9 of the policy requires the provision of open space in line with the Council’s open space standards in accordance with Policy DC5.
<ul style="list-style-type: none"> • Storey Homes considers clarification should be provided as to whether the costs of providing decentralised energy infrastructure have been factored into the Viability Assessment. 	<ul style="list-style-type: none"> • The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the Plan. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the proposed allocations in consultation with developers promoting sites in these areas. This includes the costs of providing renewable and low carbon energy/decentralised energy infrastructure requirements. The Council is therefore confident that the infrastructure required to support the Plan is capable of being delivered.
<ul style="list-style-type: none"> • There are some developers who consider that the site proposed by Policy OS3 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted sites with most representations regarding the Green Belt Assessment of sites and housing requirement. 	<ul style="list-style-type: none"> • In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The assessment considered the contribution that larger General Areas, individual parcels adjacent to the main urban area and inset settlement boundaries and development sites promoted through the ‘call for sites’ all made to Green Belt criteria.
<ul style="list-style-type: none"> • Satnam Millennium Ltd consider that all the development north of M62 will put additional pressure onto J9 of the M62 and that this must be taken into account in any mitigation scheme agreed for the M62 junction 9. The plan should set out the requirement for a mechanism for the non-green belt site at Peel Hall and these sites to share the costs of that mitigation scheme. 	<ul style="list-style-type: none"> • Part 14 (c) of the policy allows for necessary network improvements as identified by a Transport Assessment. Highways England are responsible for the motorway network and any advice from them will be taken into consideration.
Statutory Consultees	

Policy OS3 – Culcheth (now Policy OS2 in the updated PSVLP)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • There is a High Pressure Gas Pipeline that crosses the site and National Grid requests that the Policy wording is amended to safeguard the pipeline route so that it is taken into account when site options are developed in more detail. 	<ul style="list-style-type: none"> • The Utilities and Environmental Protection Section of the policy (Part 20) seeks to protect the operation and access to the Gas Pipeline that runs across the site.
Other	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust (CWT) consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation. 	<ul style="list-style-type: none"> • The Natural Environment section of the policy (Part 11) requires a scheme for measurable biodiversity net gain to be demonstrated using the Defra Metric in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> • CWT advise that the mature native hedgerows, many of which contain mature trees, within this site are also classified as habitats of principal importance. In order to comply with proposed Policy DC4 and paragraph 174(b) of the NPPF habitats of principal importance (priority habitats) must be avoided, mitigated for, or as a last resort compensated for i.e. the mitigation hierarchy must be shown to have been applied. Where an allocation contains mature trees, no guidance has been provided on how these should be avoided where possible. 	<ul style="list-style-type: none"> • Part 10 of the policy make reference to taking account and reinforcing existing hedgerows and trees along the site boundaries. Whilst, Part 11 of the policy makes reference to the need for the development to assess the impacts on Priority Species and Habitats through the application of the mitigation hierarchy in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> • The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites. 	<ul style="list-style-type: none"> • Support noted. • WBC maintain a register of individuals and groups, who are seeking to acquire serviced plots of land in the authority’s area in order to build houses for those individuals to occupy as homes, as required by the Self-build and Custom Housebuilding Act 2015.

Policy OS3 – Culcheth (now Policy OS2 in the updated PSVLP)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Culcheth Sports Club request that some of any future s106 contributions accruing from the site be used to improve local sports facilities. In particular a payment to the Culcheth Sports Club on Charnock Road on the grounds that it would encourage the new residents to be aware of and make use of this facility. 	<ul style="list-style-type: none"> • Where S106 funding will be directed to improve local sports facilities will be determined at the application stage by the Council’s Leisure Services Team and other appropriate service providers/stakeholders having regard to the most up-to-date evidence base (Playing Pitch Strategy – Action Plan and Sports Facilities Strategic Needs Assessment).
<ul style="list-style-type: none"> • Culcheth High School (CHS) consider that the Plan is unsound in relation to financial allocations to education and sports pitches in the Culcheth area. It is proposed to allocate funding to primary school places in Culcheth but not to secondary provision. There should be provision to extend places at CHS with potential to expand in the next 10 years due to the proposed housing. In addition it is proposed to allocate 600K to Shaw Street playing fields to develop 4G pitch provision. It is not clear who will manage this resource moving forward under the local playing resource strategy. It would be more prudent to allocate funding to update and expand the current provision at CHS which already has the infrastructure and Livewire management systems in place to manage and develop a local facility. 	<ul style="list-style-type: none"> • Part 6 of the policy requires a contribution towards the provision of both additional primary and secondary school places to meet the need for school places that will be generated from the development. • The Council has recently updated its Playing Pitch Strategy and associated Action Plan (Jan 2020). The Action Plan has been produced in consultation with local stakeholders and identifies where new and enhanced provision is required to meet the needs of the proposed level of development in the Local Plan. The Action Plan identifies the provision of a AGP at Shaw Street Recreation Ground, which is a local authority owned/operated facility.

Policy OS4 - Hollins Green (now Policy OS3 in the updated PSVLP)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The proposed allocation will devalue properties adjacent to the site as it will impact on views of the open countryside that currently exist. 	<ul style="list-style-type: none"> It is acknowledged that there will be some loss of views of the open countryside. However, detailed design issues will be assessed at the planning application stage. All development will be expected to meet Policy ENV8 (Environmental and Amenity Protection), Warrington's adopted design guidance and achieve a low density of development (30 dwellings per hectare) to reflect the countryside location of the allocation.
<ul style="list-style-type: none"> A minimum of 30% of the homes are proposed to be affordable (ie. 30 dwellings) and a further 20% for elderly residents. This will leave just 42 homes as standard family properties. This is an unequal balance. Hollins Green already has a relatively high proportion of housing association homes and council properties. 	<ul style="list-style-type: none"> The housing requirement is based on guidance from the government and is a whole Borough requirement and not specific to one neighbourhood. Similarly the Local Housing Need Assessment (LHNA) (2021) is based on borough wide needs including that for affordable housing which has indicated a policy need for a 30% supply on site except for the inner areas of Warrington, which are dominated by brownfield sites that have higher costs impacting on viability. The LHNA also indicates a need for accommodation for elderly people including sheltered, extra care adaptable homes or residential care. Warrington's population of older residents (aged 75 or older) is forecast to increase by almost 50% over the plan period, therefore meeting the needs of this demographic is important.
<ul style="list-style-type: none"> Any equipped play provision that is on the new estate will only be of benefit to the people who live on the estate. Any financial support needs to benefit all of the community and any new provision should be in the centre of the village on the existing Village Green. 	<ul style="list-style-type: none"> The provision of play facilities and open space is determined through the application of the Council's adopted standards in the Open Space Audit and Planning Obligations SPD where there is a deficit in the ward or settlement when measured against the existing standards. The provision of POS is to meet the needs of the proposed development.
<ul style="list-style-type: none"> Paragraph 10.8.4 states that the location will ensure good access to major existing employment areas at Birchwood. This is plainly not correct. The nearest areas of employment by road are Woolston Grange and Northbank Industrial Estate in Irlam. The road from Dam Lane to the M62 motorway junction is not a public right of way for vehicles. There is 	<ul style="list-style-type: none"> The Council considers that the site is well located to access services in Hollins Green and employment areas in Birchwood. Nevertheless, it is acknowledged that there are other employment opportunities that are accessible from the site. To support the development Part 14 of the policy requires a package of transport measures to support the

Policy OS4 - Hollins Green (now Policy OS3 in the updated PSVLP)	
Summary of Issues Raised	Response
<p>a railway station at Glazebrook but due to the very limited parking, and infrequency of trains, this is currently not a viable transport option. The cycle way network is currently not well connected to Hollins Green. Cycle ways will need to be developed to Warrington, Irlam and Birchwood in order to connect to areas of employment.</p>	<p>development to be introduced, including access to the site, cycling and walking routes and any other necessary network improvement.</p>
<ul style="list-style-type: none"> • Access to the site will be difficult. Most of the roads adjacent to the site are too small to cope with any increase in traffic and accessing Manchester Road is not that easy for vehicles, especially if trying to turn right. • The local road network is already very congested. Manchester Road (A57) is a major trunk route from Warrington and the M6 to Salford and Manchester. At rush hour there are long queues of standing traffic. It is already a Red Route with many accidents occurring each year. Adding to the volume of traffic on this route will only add to the potential increase in the number of accidents. Traffic congestion already backs up to Glazebrook Lane and Warburton Bridge at peak times. The proposed increases in homes in Culcheth (200 homes), Croft (75 homes) and Lymm (430 homes) all have the potential to increase the traffic flow along the A57, Glazebrook Lane and Warburton Bridge. 	<ul style="list-style-type: none"> • To support the Council's Local Plan, a new transport model has been developed. The Warrington Multi Modal Transport Model (WMMTM) (2021), has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. The policy (Part 14c) requires the development to provide a full Transport Assessment and transport improvements for the site.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • There is strong support from the developer whose site is proposed to be allocated by Policy OS4. The developer has confirmed that the site is available, suitable and achievable to deliver the amount of development proposed by draft policy OS4. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • A number of detailed modifications are suggested, in summary these are: <ul style="list-style-type: none"> ○ Amending wording of Part 1 of the policy to refer to a minimum of 100 homes. 	<ul style="list-style-type: none"> • Part 1 of the policy refers to the allocation delivering a minimum of 90 homes. This is an appropriate minimum number given the size of the site and it's edge of settlement location and will not prevent the delivery of more homes.

Policy OS4 - Hollins Green (now Policy OS3 in the updated PSVLP)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> ○ Parts 6 and 7 (Community Facilities) of Policy OS4 should be amended to only require contributions towards school and health care provision providing it can be demonstrated that there is no existing capacity in the local schools and medical centre. ○ Part 17 of Policy OS4 does not consider location, orientation and design as a way of reducing greenhouse gas emissions through planning for new development and is, therefore inconsistent with paragraph 150 of the NPPF. Neither does it explain clearly what constitutes 'suitable development' for renewable and low carbon energy. Furthermore, it does not have a clause whereby new development should comply with development plan policies for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable, as detailed at paragraph 153 of the NPPF. 	<ul style="list-style-type: none"> ● The options assessment process took into account existing infrastructure within the main urban area of Warrington and each of the settlements and was undertaken jointly with other Council teams and partner agencies responsible for service provision. This has included the Council teams responsible for education, parks and open spaces, transportation, culture and leisure and public health, together with the Warrington Clinical Care Commissioning Group and other NHS services operating in the borough. ● Part 4 of the general design policy (DC6) requires development to consider orientation and design as a means of climate change adaptation. Part 19 of Policy OS4 (now OS3 in the updated PSVLP) refers to Policy ENV7. Part 5 of this policy specifically relates to the strategic housing and employment allocations, including the settlement allocation sites and only requires them to establish or connect to an existing decentralised energy network if it is feasible and viable to do so.
<ul style="list-style-type: none"> ● There are some developers who consider that the site proposed by Policy OS4 is not the most suitable site and that there are alternative sites that are more suitable, these are identified as omitted sites with most representations regarding the Green Belt Assessment of sites and housing requirement. ● There are some developers who consider that there are significant flaws in the evidence base which has underpinned the selection of a number of allocations in the Outlying Settlements. 	<ul style="list-style-type: none"> ● In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The assessment considered the contribution that larger General Areas, individual parcels adjacent to the main urban area and inset settlement boundaries and development sites promoted through the 'call for sites' all made to Green Belt criteria. ● The methodology for assessing sites was developed by independent consultant's following a review of national guidance and best practice. The assessment approach focused on using a sequential approach with sites prioritised for assessment based on Local Plan spatial priorities and Green Belt assessment outcomes. Applying a sequential approach to the assessment of sites through the use of major constraints, such as lower performing Green Belt sites as a means of sifting sites is considered to be consistent with national policy.

Policy OS4 - Hollins Green (now Policy OS3 in the updated PSVLP)	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> All the supporting evidence base documents have been updated since the first Regulation 19 consultation in 2019.
Statutory Consultees	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Other	
<ul style="list-style-type: none"> Cheshire Wildlife Trust (CWT) consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation. 	<ul style="list-style-type: none"> The Natural Environment section of the policy (Part 11) requires a scheme for measurable biodiversity net gain to be demonstrated using the Defra Metric in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> CWT advise that the mature native hedgerows, many of which contain mature trees, within this site are also classified as habitats of principal importance. In order to comply with proposed Policy DC4 and paragraph 174(b) of the NPPF habitats of principal importance (priority habitats) must be avoided, mitigated for, or as a last resort compensated for i.e. the mitigation hierarchy must be shown to have been applied. Where an allocation contains mature trees, no guidance has been provided on how these should be avoided where possible. 	<ul style="list-style-type: none"> Part 10 of the policy make reference to taking account and reinforcing existing hedgerows and trees along the site boundaries. Whilst, Part 11 of the policy makes reference to the need for the development to assess the impacts on Priority Species and Habitats through the application of the mitigation hierarchy in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites. 	<ul style="list-style-type: none"> Support noted. WBC maintain a register of individuals and groups, who are seeking to acquire serviced plots of land in the authority’s area in order to build houses for those individuals to occupy as homes, as required by the Self-build and Custom Housebuilding Act 2015.

Policy OS4 - Hollins Green (now Policy OS3 in the updated PSVLP)

Summary of Issues Raised

Response

- Although the development Hollins Green will not impact the Trans Pennine Trail (TPT) the note of walking and cycling infrastructure is welcomed. The TPT would ask that all facilities are fully accessible and include the needs of cycle storage/charging points and wheelchair/scooter charging stations.

- Comments noted.

Policy OS5 - Lymm - Massey Brook Lane	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The number of houses proposed for Lymm is too high. The town has increased significantly in size in the last 25 years and the infrastructure cannot cope with more development. In particular the surgeries and schools are already full, and the roads are at full capacity now, before any further additional demands are put on them. Development will increase traffic congestion and rat running on adjacent roads (Hardy Road/Highfield Road). There is already significant congestion on both Booths Hill Road and Cherry Lane but no clear plans for mitigating options for additional demand. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> The development would reduce the green space between the M6 and the existing settlement and create even more noise and air pollution to add to that created by the motorway (Thelwall Viaduct) 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> The Site Assessment Proforma indicates the site capacity should be restricted to 50 dwellings. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> Not all of the site is available for development. There are a number of gardens of houses in Highfield Road that are within the designated red lined area of the site allocation and part of the site is not owned by the site promoter. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> There has been no consideration of the cumulative impact of all the proposed allocations in Lymm in respect of traffic, school and health services. Any necessary infrastructure should be built before the houses, not afterwards. There are no guarantees that developers will contribute to the costs/provision of any necessary infrastructure/facilities when they are needed. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.

Policy OS5 - Lymm - Massey Brook Lane	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Massey Brook Lane cannot cope with the additional traffic that would be created on a daily basis. Access/exit from the site on to Massey Brook Lane could not be achieved. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • The policy states 'connection to Footpath No 6 is required', additional third party land is required (having regard to Land Registry) to make this connection so it is unlikely this could be achieved. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • WBC ignored the government's own five purposes for Green Belt. The proposal will not contribute to urban regeneration and will contribute to settlements merging. The very special circumstances necessary justify release of GB not been demonstrated. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • The plan leads to encroachment on the countryside and will destroy the wildlife that inhabit the area including badgers and newts. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • OS5 will harm the distinctive identity and the rural setting of the village of Lymm. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • The plan actually impedes urban regeneration, by discouraging the recycling of derelict land because it shows potential developers that it is acceptable to buy Green Belt land and keep pushing to build houses on it. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • The high value of houses planned in the Lymm area will not be affordable for local families they will probably be bought up by commuters, we need more affordable houses. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • Lymm has an extremely active Neighbourhood Plan Group which has been working very hard with the local community, it is very disappointing 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is

Policy OS5 - Lymm - Massey Brook Lane	
Summary of Issues Raised	Response
<p>that this Group has not been involved in the selection of possible sites for housing.</p>	<p>no longer available for development, having been withdrawn from the Local Plan process by the owners.</p>
<ul style="list-style-type: none"> • Two Village Design Statements have previously been ignored by planners once completed which was demoralising and leads to loss of trust. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • The <i>Development Options and Site Assessment Technical Report March 2019 (Page 66)</i> states that "The site is considered to be available as it was promoted by the owner with no active uses or ownership issues." This is incorrect. There are currently 8 separate ownership parties to this land parcel. At least 6 of which do not wish to sell for development. The land is currently subject to an Agricultural Tie which restricts any sale unless a further 8 parties agree to the sale. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
MP, Local Borough, Town or Parish Councillor (3):	
<ul style="list-style-type: none"> • South Warrington Parish Council's Local Plan Working Group consider that the Policy is not sound because the allocated site extends into open countryside and represents settlement sprawl. Currently there is a clear and distinct edge to the settlement and boundary to the Green Belt formed by development on Highfield Road. Massey Brook does not provide a visually obvious boundary of any permanence. The site is prominent when viewed from the A56 especially when viewed from the elevation of Camsley Lane Bridge. The allocation would begin to merge the existing settlement with the ribbon of development on Massey Brook Lane. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • Lymm Parish Council are concerned about the effect of the new developments on already busy roads around Lymm. Many HGVs use them ignoring weight limits. There is additional traffic if the motorway is closed and it is considered that air quality is a problem especially at the pinchpoints. There is considerable cynicism amongst residents, which the PC share, about the judgement of the Council's Highways 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.

Policy OS5 - Lymm - Massey Brook Lane	
Summary of Issues Raised	Response
<p>Department over traffic safety issues. There is an over reliance on recorded statistics at the expense of common sense and local knowledge.</p>	
<ul style="list-style-type: none"> • Lymm Parish Council has concerns about the provision of infrastructure. Whilst, reference is made in the Policies to contributions from developers to both primary and secondary schools, no consideration been given to the ability of the schools to cope with these additional demands. There is not enough capacity in the sewerage system to accommodate the new housing. There are a large number of small businesses in Lymm, many of which depend on fast broadband connections. Lymm has slow broadband already and there will not be enough capacity to service the increase in demand. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • Lymm Parish Council <u>do not</u> consider that all of the site is available for development. There are a number of gardens of houses in Highfield Road that are within the designated red lined area of the site allocation and part of the site is not owned by the site promoter. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
Landowner/Developer	
<ul style="list-style-type: none"> • Owner of southern part of site has indicated that their portion of the proposed allocation is <u>not</u> available for development. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> • Wallace Land Investment is supportive of the growth planned for Lymm subject to the addition of its proportionate share of the additional housing land requirement resulting from the increase in the flexibility allowance from 10% to 20%. Land for a further 750 homes should allocated proportionately to the outlying villages of which Lymm should accommodate an additional 310 homes (41%). 	<ul style="list-style-type: none"> • The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements.
<ul style="list-style-type: none"> • Wallace Land Investments recommends that its site at Cherry Lane, Lymm is allocated for 200 homes plus service site for GP practice (if 	<ul style="list-style-type: none"> • KU

Policy OS5 - Lymm - Massey Brook Lane	
Summary of Issues Raised	Response
<p>required) or playing fields for Cherry Tree Primary School in response to the updated housing land requirement, arising from the addition of an increased flexibility allowance. The evidence, submitted as part of the separate representation, confirms that the proposal is a more sustainable development opportunity and does not make a greater contribution to the Green Belt than the other four proposed allocation sites in Lymm.</p>	
<ul style="list-style-type: none"> • Langtree object to the Green Belt designation of their site at Booth Lane (Lymm), which should be removed from the Green Belt and re-allocated for housing as an extension to allocation OS5 Massey Brook Lane. 	<ul style="list-style-type: none"> • KU
<ul style="list-style-type: none"> • Peel Holdings (Management) Ltd has undertaken a critique of the Council's appraisal of the proposed allocation OS5 as set out in the Site Proforma Assessment Report. This critique demonstrates that the site's suitability scoring should be revised as follows: 'Green Belt' should be recorded as amber reflecting a moderate Green Belt contribution and 'Proximity and accessibility to Lymm Centre' should be recorded as red reflecting that the site is more than 1.5 km from Lymm Centre. Peel Holding's assessment of the Council's appraisal comprising Green Belt parcel LY16 demonstrates that the site's suitability scoring should be revised as follows: 'Green Belt' should be amended to yellow reflecting a weak Green Belt contribution; 'Proximity and accessibility to Lymm Neighbourhood Centre' should be amended to amber reflecting that the site is between 1k and 1.5km from Lymm Centre; 'Contamination' should be amended to green reflecting that the consented appeal scheme will secure the remediation of the site. Further impact on Green Belt should be given greater weight and the sequential approach to site selection, as required by paras 157 and 158 of the NPPF justifies the allocation of land within Parcel LY16 in preference to site allocation OS5. Taking these points together, it is evident that Peel's proposed development off Rushgreen Road (east of Tanyard Farm) presents a more sustainable 	<ul style="list-style-type: none"> • KU

Policy OS5 - Lymm - Massey Brook Lane	
Summary of Issues Raised	Response
allocation to deliver the plan period needs of the settlement compared to the selected site allocation OS5.	
<ul style="list-style-type: none"> • Anwyll Land Ltd Our Client support in principle the need for the allocation of sites within outlying settlements to boost homes within the local area. However, it remains unclear how or why only an “incremental growth” option for each outlying settlement has been calculated or defined. It appears to be based on a candidate site submission rather than assessing what the needs of each settlement actually are. This is not a justified or a sound approach. It is Anwyll Land Ltd view that the amount of housing proposed within these outlying settlements is not sufficient and further land release is required, as currently less than 6% of the Borough’s overall Plan period housing requirements will be delivered within the outlying settlements. 	<ul style="list-style-type: none"> • The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements.
<ul style="list-style-type: none"> • Whilst it is acknowledged that four sites have been identified within Lymm for development, it is Anwyll Land Ltd’s position that their site at Mill Lane is the most suitable for development. It is unclear why these sites have been selected for development particularly given that the sites identified as suitable for allocation have flood risk concerns (Flood Zones 2 and 3); air quality implications; contamination; listed buildings and landscape concerns. It is considered that the justification and balancing exercise undertaken by the Council in relation to these sites is not robust, and an inconsistent approach to site selection has been undertaken. On this basis, Anwyll Land Ltd object to the proposed allocation of Sites OS5 – OS9 as drafted on the basis that the justification for these allocations is not sound and fails to meet the tests set out in Paragraph 35 of the NPPF. 	<ul style="list-style-type: none"> • The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. The sites that have been selected predominantly lie within Flood Zone 1.
Statutory Consultees	
<ul style="list-style-type: none"> • Under the heading of <i>Utilities and Environmental Protection</i>, United Utilities recommend additional criterion (in blue-available from the full representation) given the location of the site in a groundwater source protection zone. 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.

Policy OS5 - Lymm - Massey Brook Lane	
Summary of Issues Raised	Response
Other	
<ul style="list-style-type: none"> Cheshire Wildlife Trust consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> Cheshire Wildlife Trust advise that the mature native hedgerows, many of which contain mature trees, within this site are also classified as habitats of principal importance. In order to comply with proposed Policy DC4 and paragraph 174b of the NPPF habitats of principal importance (priority habitats) must be avoided, mitigated for, or as a last resort compensated for i.e. the mitigation hierarchy must be shown to have been applied. Where an allocation contains mature trees, no guidance has been provided on how these should be avoided where possible. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites. 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.
<ul style="list-style-type: none"> The Trans Pennine Trail requests inclusion during the consultation process as part of the Lymm developments. This policy should note the close proximity of the current TPT. There will be increase footfall that will utilise the TPT as part of these developments. WBC should work with 	<ul style="list-style-type: none"> The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.

Policy OS5 - Lymm - Massey Brook Lane	
Summary of Issues Raised	Response
<p>developers regarding future maintenance of the Trail and any diversions needed during works. Accessible sustainable transport routes that also interconnect with the TPT should be provided as part of the intended future developments. The TPT would ask that all facilities are fully accessible and include the needs of cycle storage / charging points and wheelchair / scooter charging stations.</p>	
<ul style="list-style-type: none"> • There has been a clear imbalance over the years with undue emphasis on larger family dwellings for sale and a lack of affordable housing. Given the imbalance a clear statement should now be made in favour of say, 50% of homes in proposed developments being 'affordable' (Unknown source). 	<ul style="list-style-type: none"> • The site is no longer proposed to be allocated. The Massey Brook Lane allocation site has been removed from the updated PSVLP as the site is no longer available for development, having been withdrawn from the Local Plan process by the owners.

Policy OS6 - Lymm - Pool Lane (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Warrington Road)	
Summary of Issues Raised	Response
<p>Residents</p> <ul style="list-style-type: none"> • The number of houses proposed for Lymm is too high. The town has increased significantly in size in the last 25 years and the infrastructure cannot cope with more development. In particular the surgeries and schools are already full, and the roads, particularly Whitbarrow Road and Rushgreen Road are at full capacity now, before any further additional demands are put on them. Development will increase traffic congestion. Warrington Road in Satham will see considerable increase in traffic given the two large developments planned for that area. The additional traffic will create more chaos around Satham Primary School, where there are already traffic issues in the morning and afternoon peak times. 	<ul style="list-style-type: none"> • The housing requirement is based on planning guidance from the government and is a whole Borough requirement and is not specific to one neighbourhood. • The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. • The Council considers that the number of homes being proposed in Lymm under the Spatial Strategy will ensure the character of Lymm is maintained. The Council’s assessment of infrastructure demonstrates that early delivery of homes can be achieved, subject to the expansion of one of Lymm’s primary schools and the provision of a new health facility. The Updated PSVLP has however removed the Massey Brook Lane allocation as the site promoter and land owners have confirmed the site is no longer available and have requested that the site is withdrawn from the Local Plan process. This will reduce the number of homes proposed in Lymm by 60. • Parts 15 to 17 of the allocation policy in the updated PSVLP require a full transport assessment and transport improvements to support the development. The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care (Parts 7, 8 and 10). The development will be expected to provide

Policy OS6 - Lymm - Pool Lane (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Warrington Road)	
Summary of Issues Raised	Response
	<p>minimum open space/equipped play in line with Council standards (Part 9).</p>
<ul style="list-style-type: none"> • The bulk of the proposed housing is on the north side of Lymm. Travelling out of Lymm from these locations is not easy due to the Manchester Ship Canal to the north and the village centre with its narrow 20 mph residential streets and the Bridgewater Canal to the south. 	<ul style="list-style-type: none"> • To support the Council’s Local Plan, a new transport model has been developed. The Warrington Multi Modal Transport Model (WMMTM) (2021) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable.
<ul style="list-style-type: none"> • Pool Lane has been subject to severe flooding in the past. Development would put current residents at risk from further flooding due to loss of vegetation. The policy does not identify what mitigation measures have been considered against flooding. 	<ul style="list-style-type: none"> • Part 18 of the policy indicates that a site-wide surface water strategy is required incorporating Sustainable Urban Drainage (SUDs) and flood alleviation measures. Any planning permission will need to comply with this point and be in line with requirements of the Environment Agency and United Utilities.
<ul style="list-style-type: none"> • The development would create even more noise and air pollution to add to that created by the Thelwall Viaduct. 	<ul style="list-style-type: none"> • The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process. The proposed employment and residential allocations in the Plan are all dependent on infrastructure improvements to either the Strategic and/or Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts. The Local Plan Air Quality Modelling Report concludes that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to

Policy OS6 - Lymm - Pool Lane (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Warrington Road)	
Summary of Issues Raised	Response
	implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised.
<ul style="list-style-type: none"> Any necessary infrastructure should be built before the houses, not afterwards. There are no guarantees that developers will contribute to the costs/provision of any necessary infrastructure/facilities when they are needed. 	<ul style="list-style-type: none"> The phasing of the infrastructure will be the subject of a S106 Agreement at the planning application stage.
<ul style="list-style-type: none"> WBC ignored the government’s own five purposes for Green Belt. The proposal will not contribute to urban regeneration and will contribute to settlements merging. The very special circumstances necessary justify release of GB not been demonstrated. 	<ul style="list-style-type: none"> The potential implications of releasing the ‘selected sites’ from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundary are addressed in the Council’s Implications of Green Belt Release Report (August 2021). In respect of the sites around Lymm the conclusion is that their removal from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the outlying settlements. In accordance with paragraph 141 of the NPPF, the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. The requirement to ensure that sufficient land is provided to meet Warrington’s development needs; that housing affordability is addressed; and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’.
<ul style="list-style-type: none"> The plan leads to encroachment on the countryside and will destroy the wildlife that inhabit the area including badgers and newts. 	<ul style="list-style-type: none"> Policy DC4 expects that ecological surveys of the site take place and where habitat is lost that there is appropriate compensatory provision and a measurable net gain in biodiversity. The survey should consider any protected and other wildlife in line with the Wildlife and Countryside

Policy OS6 - Lymm - Pool Lane (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Warrington Road)	
Summary of Issues Raised	Response
	Act provisions. Part 11 of the policy requires that the layout of the development should take account of existing landscape feature including its contribution to the Mersey Forest (the local delivery framework for the Northern Forest).
<ul style="list-style-type: none"> • The plan obliterates the setting and special character of the historic town of Lymm by making it another building site with lots of new quick build characterless houses. 	<ul style="list-style-type: none"> • The development will be at a fairly low density of 30 dwellings per hectare and in line with Council’s Design and Construction SPD which promotes design that reflects the character of an area. In addition, Part 2 of the policy specifies that the development should be in-line with Lymm Heritage and Character Assessment and the emerging neighbourhood plan.
<ul style="list-style-type: none"> • OS6 will harm the distinctive identity and the rural setting of Statham Lodge heritage site. 	<ul style="list-style-type: none"> • Part 23 of the policy requires development to take account of the proposed mitigation and enhancement measures outlined in the Heritage Impact Assessment for the site.
<ul style="list-style-type: none"> • The plan actually impedes urban regeneration, by discouraging the recycling of derelict land because it shows potential developers that it is acceptable to buy Green Belt land and keep pushing to build houses on it. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF, the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of brownfield sites, optimised the density of development on town centre sites and discussing with neighbouring authorities the possibility that they could accommodate some of Warrington’s needs, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release.
<ul style="list-style-type: none"> • The high value of houses planned in the Lymm area will not be affordable for local families they will probably be bought up by commuters, we need more affordable houses. 	<ul style="list-style-type: none"> • Part 4 of the policy requires the provision of affordable housing in line with the requirements of Policy DEV2. Policy DEV2 looks to provide a mix of housing types on sites, together with different methods of purchase. New development in south Warrington will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council’s housing waiting list. A third will be for low cost home ownership, of which the majority will be ‘First Homes’ specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home

Policy OS6 - Lymm - Pool Lane (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Warrington Road)	
Summary of Issues Raised	Response
	Discount, to ensure these homes are genuinely affordable for first time buyers.
<ul style="list-style-type: none"> • Lymm has an extremely active Neighbourhood Plan Group (NPG) which has been working very hard with the local community, it is very disappointing that this Group has not been involved in the selection of possible sites for housing. 	<ul style="list-style-type: none"> • The Local Plan preparation and consultation process is set out and prescribed by Planning and Compulsory Purchase Act 2004, the NPPF and Planning Practice Guidance. In line with this consultation has been carried out with all residents, stakeholders and prescribed bodies. The Council has engaged with the NPG and taken their views into account, however, no suggestions of site allocations were made.
<ul style="list-style-type: none"> • Policy OS6 does not meet General Principle 1 of Policy ENV2, as there are areas of lower risk of flooding that should be considered for development. 	<ul style="list-style-type: none"> • The Site Assessment process considers the performance of each site with regard to a range of issues not just flood risk. Whilst, a small part of the western edge of the site falls within Flood Zone 2, the vast majority of the site is within Flood Zone 1 (Revised EA Flood Mapping - April 2021). • Overall the site performed well against the assessment criteria. • In line with national guidance and ENV2 a full flood risk assessment will be required that meets sequential testing criteria and details any mitigation measures as required by national guidance and policy.
<ul style="list-style-type: none"> • The site at Pool Lane would, if developed, represent the least damaging loss of open land. 	<ul style="list-style-type: none"> • Comment noted.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<p>South Warrington Parish Council's Local Plan Working Group consider that the Policy is not sound for the following reasons;</p> <ul style="list-style-type: none"> • the site encroaches into open countryside which currently provides an attractive and distinct rural edge to the village. The site slopes gently upwards to the north, is prominent in views approaching Statham from the west and provides an attractive landscaped setting for the north western edge of Lymm. • no information is provided to ensure that there is sufficient capacity and space to extend local primary and secondary schools or health facilities. • Statham Lodge is a grade II listed building. The setting of the building will be adversely affected. 	<ul style="list-style-type: none"> • The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements • Parts 7 and 8 of the policy require that financial contributions are made for school places and primary care provision. The Local Planning

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	<p>Authority will be advised by Education and Health Services on where these funds should be directed and to what.</p> <ul style="list-style-type: none"> • Part 23 of the policy requires mitigation to be provided in line with the Heritage Impact Assessment to protect the setting of Statham Lodge.
<ul style="list-style-type: none"> • Lymm Parish Council are concerned about the effect of the new developments on already busy roads around Lymm. Many HGVs use them ignoring weight limits. There is additional traffic if the motorway is closed and it is considered that air quality is a problem especially at the pinchpoints. There is considerable cynicism amongst residents, which the PC share, about the judgement of the Council's Highways Department over traffic safety issues. There is an over reliance on recorded statistics at the expense of common sense and local knowledge. 	<ul style="list-style-type: none"> • To support the Council's Local Plan, a new transport model has been developed. The Warrington Multi Modal Transport Model (WMMTM) (2021) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. • Part 15 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development.
<ul style="list-style-type: none"> • Lymm Parish Council has concerns about the provision of infrastructure. Whilst, reference is made in the Policies to contributions from developers to both primary and secondary schools, no consideration been given to the ability of the schools to cope with these additional demands. There is not enough capacity in the sewerage system to accommodate the new housing. There are a large number of small businesses in Lymm, many of which depend on fast broadband connections. Lymm has slow broadband already and there will not be enough capacity to service the increase in demand. 	<ul style="list-style-type: none"> • Policy ENV3 (Utilities and Communications) specifies at Part 2 that the Council will support the installation of existing and emerging telecommunications technology in new residential and employment development, to improve the connectivity of the population, support business growth and facilitate home working and Part 3 states developers will be required to work with the Council and appropriate providers to deliver the necessary physical infrastructure and networks as an integral part of all new developments, taking into account the need to 'future proof' development to accommodate emerging technologies. • Parts 18 and 19 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
Landowner/Developer	
<ul style="list-style-type: none"> • Gladman Developments Ltd support the allocation. The site is not subject to any technical, landownership or viability constraints that 	<ul style="list-style-type: none"> • Support noted.

Policy OS6 - Lymm - Pool Lane (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Warrington Road)	
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<p>would preclude development. The site is being actively promoted on behalf of the landowners and can be delivered in the short term. All of the policy requirements within OS6 can be met, including required planning obligations (subject to meeting requirements of NPPG para 56 and relevant CIL regulations). As presently drafted the requirements for OS6 and OS8 envisage that the two allocations will come forward independently in respect of open space requirements. It is suggested that the overall policy could be amended to reflect the possibility that the two sites may come forward as a single proposal.</p>	<ul style="list-style-type: none"> • It is acknowledged that both sites are under the control of the same site promoter/owner who has indicated a desire to bring them forward jointly. The updated PSVLP has amalgamate Policies OS6 and OS8 into one new policy OS4.
<ul style="list-style-type: none"> • Wallace Land Investment is supportive of the growth planned for Lymm subject to the addition of its proportionate share of the additional housing land requirement resulting from the increase in the flexibility allowance from 10% to 20%. Land for a further 750 homes should be allocated proportionately to the outlying villages of which Lymm should accommodate an additional 310 homes (41%). 	<ul style="list-style-type: none"> • The Council considers that the 10% benchmark allowance provides sufficient flexibility in the housing land supply. Release over and above this limit in the outer settlements will undermine the spatial strategy and impact on regeneration plans and undermine the maximisation of urban sites and their capacity to deliver new homes.
<ul style="list-style-type: none"> • Anwyl Land Ltd Our Client support in principle the need for the allocation of sites within outlying settlements to boost homes within the local area. However, it remains unclear how or why only an “incremental growth” option for each outlying settlement has been calculated or defined. It appears to be based on a candidate site submission rather than assessing what the needs of each settlement actually are. This is not a justified or a sound approach. It is Anwyl Land Ltd view that the amount of housing proposed within these outlying settlements is not sufficient and further land release is required, as currently less than 6% of the Borough’s overall Plan period housing requirements will be delivered within the outlying settlements. 	<ul style="list-style-type: none"> • The Council has considered a range of alternatives for Green Belt release including more release around the settlements. However, this was considered harder to deliver and mitigate due to the impacts on existing infrastructure. • It is considered that the areas of Green Belt release proposed provide the most sustainable way of meetings Warrington’s development needs as part of the Plan’s overall Spatial Strategy whilst ensuring the long term integrity of Warrington’s Green Belt. The majority of new housing is in a few large Green Belt allocations that bring with it corresponding amounts of new and improved infrastructure.
<ul style="list-style-type: none"> • There are some developers who consider that the site proposed to be allocated by Policy OS6 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. 	<ul style="list-style-type: none"> • In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt Assessment has taken place. The assessment considered the contribution that larger General Areas, individual parcels adjacent to the main urban area and inset settlement

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<p>These are identified as omitted sites and representations mostly relate to the Green Belt assessments and housing requirement figures.</p>	<p>boundaries and development sites promoted through the ‘call for sites’ process make to the 5 purposes of Green Belt.</p> <ul style="list-style-type: none"> • In determining Warrington’s housing requirement, the Council has followed the Government’s Standard Housing Methodology and associated Planning Practice Guidance. The Updated PSVLP proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. • The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council’s economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period. • The Council is confident that setting the housing requirement of the Plan to the minimum requirement under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the previous proposed target.
<p>Statutory Consultees</p> <ul style="list-style-type: none"> • Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment subject to a few minor amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to 	<ul style="list-style-type: none"> • Support noted. • It is agree that the proposed modifications would strengthen and clarify the policy. The Historic Environment section of the policy (Part 22) has been revised in the updated PSVLP as outlined by Historic England.

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<p>appropriately deal with the heritage asset at risk. Paragraph 20 should be amended to read: “Development will be required to preserve and enhance the <u>historic environment, heritage assets and their setting</u>”.</p> <p>Paragraph 21 should be amended to read: “Development proposals will be required to be in accordance with the Heritage Impact Assessment for Lymm – Pool Lane including the proposed mitigation and enhancement measures.” It is recommended that Bullet 21(a) is deleted entirely to ensure that it is consistent with the NPPF and the content of the HIA.</p> <p>The suggested change to Para 21 would mean there is no need to include additional detail.</p>	
Other	
<ul style="list-style-type: none"> Cheshire Wildlife Trust (CWT) consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation. 	<ul style="list-style-type: none"> It is acknowledged that the policy did not reflect the need to achieve net gains in biodiversity. The Natural Environment section of the policy (Part 12) has been revised in the updated PSVLP to make reference to the need for the development to deliver a measurable net gain in biodiversity in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites. 	<ul style="list-style-type: none"> Support noted. WBC maintain a register of individuals and groups, who are seeking to acquire serviced plots of land in the authority’s area in order to build houses for those individuals to occupy as homes, as required by the Self-build and Custom Housebuilding Act 2015.
<ul style="list-style-type: none"> Object to the proposed removal of Green Belt land at Pool Lane. There should be a thorough examination of alternative brownfield sites first. 	<ul style="list-style-type: none"> The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the outlying settlements. In accordance with paragraph 141 of

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	<p>the NPPF, the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release (see pages 28-30 of PSVLP). The requirement to ensure that sufficient land is provided to meet Warrington’s development needs; that housing affordability is addressed; and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’.</p>
<ul style="list-style-type: none"> • There has been a clear imbalance over the years with undue emphasis on larger family dwellings for sale and a lack of affordable housing. Given the imbalance a clear statement should now be made in favour of say, 50% of homes in proposed developments being 'affordable'. 	<ul style="list-style-type: none"> • Part 4 of the policy requires the provision of 30% affordable homes in accordance with Policy DEV2 (Meeting Warrington’s Housing Needs), which is based on the assessed housing need through the Local Housing Needs Assessment (LHNA) as required by paragraph 61 of the National Planning Policy Framework (NPPF).
<ul style="list-style-type: none"> • In assessing any new proposals it is imperative that detailed consideration is given to associated 'infrastructure' issues including the urgent expansion of primary care services. 	<ul style="list-style-type: none"> • The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements. It is acknowledged that primary care provision is at/near capacity in Lymm with little room for expansion of existing facilities. One of the other proposed allocation sites in Lymm (OS5) is required to make provision of a site for a new primary care facility. In the updated PSVLP Part 8 of Policy OS4 requires a contribution to be made towards the provision of additional primary care capacity.

Policy OS7 - Lymm - Rushgreen Road (now Policy OS5 in the updated PSVLP and amended to remove Tanyard Fm)	
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Residents	
<ul style="list-style-type: none"> The number of houses proposed for Lymm is too high. The town has increased significantly in size in the last 25 years and the infrastructure cannot cope with more development. In particular the surgeries and schools are already full, and the roads, particularly Rushgreen Road are at full capacity now, before any further additional demands are put on them. Development will increase traffic congestion and air pollution on Rushgreen Road, which is very narrow and were vehicles already have to mount the pavement to pass each other. 	<ul style="list-style-type: none"> The housing requirement is based on planning guidance from the government and is a whole Borough requirement and not specific to one neighbourhood. The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable.
<ul style="list-style-type: none"> In the past 22 years Lymm has seen over 1000 houses built in the village with no additional health, education or other facilities. The only infrastructure improvement included in the Local Plan is one Health Facility at the Tanyard Farm development. However, there is concern that this will just replace the existing surgeries in Lymm and will not be in addition to them. 	<ul style="list-style-type: none"> The Warrington NHS Clinical Commissioning Group have undertaken an assessment of the capacity of the existing GP surgeries in Lymm. A new health centre would replace the two existing GP facilities. It will provide the two practices with capacity to expand their operation to accommodate for new as well as existing patients in a modern purpose built facility.
<ul style="list-style-type: none"> The bulk of the proposed housing is on the north side of Lymm. Travelling out of Lymm from these locations is not easy due to the Manchester Ship Canal to the north and the village centre with its narrow 20 mph residential streets and the Bridgewater Canal to the south. 	<ul style="list-style-type: none"> To support the Council’s Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. Part 13 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the

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	development. The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity. The development will be expected to provide minimum open space/equipped play in line with Council standards.
<ul style="list-style-type: none"> Any necessary infrastructure should be built before the houses, not afterwards. There are no guarantees that developers will contribute to the costs/provision of any necessary infrastructure/facilities when they are needed. 	<ul style="list-style-type: none"> The phasing of the infrastructure will be the subject of S106 Agreement at the planning application stage.
<ul style="list-style-type: none"> WBC ignored the government's own five purposes for Green Belt. The proposal will not contribute to urban regeneration and will contribute to settlements merging. The very special circumstances necessary justify release of GB have not been demonstrated. 	<ul style="list-style-type: none"> The potential implications of releasing the 'selected sites' from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundary are addressed in the Council's Implications of Green Belt Release Report (August 2021). In respect of the sites around Lymm the conclusion is that their removal from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the outlying settlements. In accordance with paragraph 141 of the NPPF, the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. The requirement to ensure that sufficient land is provided to meet Warrington's development needs; that housing affordability is addressed; and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'.
<ul style="list-style-type: none"> The plan leads to encroachment on the countryside and will destroy the wildlife that inhabit the area including badgers and newts. Along the 	<ul style="list-style-type: none"> Part 11 of the policy in the Updated PSVLP requires development to take account of existing landscape features, such as watercourses. In

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<p>west boundary of this proposed site is a natural stream, the source of which is Derbyshire, and the wildlife that inhabits its banks, has been registered with RECORD at Chester Zoo, as many of the species are endangered.</p>	<p>addition, Part 12 of the policy requires the development to deliver an measurable net gain in biodiversity in accordance with the requirements in Policy DC4, which requires development to protect existing habitat.</p>
<ul style="list-style-type: none"> • The plan obliterates the setting and special character of the historic town of Lymm by making it another building site with lots of new quick build characterless houses. 	<ul style="list-style-type: none"> • The development will be at a relatively low density of 30 dwellings per hectare and in line with Council’s Design and Construction SPD which promotes design that reflects the character of an area. In addition, Part 2 of the policy specifies that development should be in-line with Lymm Heritage and Character Assessment and the emerging neighbourhood plan.
<ul style="list-style-type: none"> • Tanyard Farmhouse is identified as a heritage asset and should be protected from development. 	<ul style="list-style-type: none"> • The Tanyard Farm site no longer forms part of the proposed allocation in the Updated PSVLP, as it has already been granted Planning permission and development has commenced on site.
<ul style="list-style-type: none"> • The plan actually impedes urban regeneration, by discouraging the recycling of derelict land because it shows potential developers that it is acceptable to buy Green Belt land and keep pushing to build houses on it. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF, the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of brownfield sites, optimised the density of development on town centre sites and discussing with neighbouring authorities the possibility that they could accommodate some of Warrington’s needs, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release.
<ul style="list-style-type: none"> • The high value of houses planned in the Lymm area will not be affordable for local families they will probably be bought up by commuters, we need more affordable houses. The real demand in Lymm is for genuinely affordable housing. The 30% level of provision in Policy OS7 is not enough. 	<ul style="list-style-type: none"> • Part 4 of the policy requires the provision of affordable housing in line with the requirements of Policy DEV2. Policy DEV2 looks to provide a mix of housing types on sites, together with different methods of purchase. New development in south Warrington will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council’s housing waiting list. A third will be for low cost home ownership, of which the majority will be ‘First Homes’ specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home

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	Discount, to ensure these homes are genuinely affordable for first time buyers.
<ul style="list-style-type: none"> Lymm has an extremely active Neighbourhood Plan Group (NPG) which has been working very hard with the local community, it is very disappointing that this Group has not been involved in the selection of possible sites for housing. 	<ul style="list-style-type: none"> The Local Plan preparation and consultation process is set out and prescribed by the Planning and Compulsory Purchase Act 2004, the NPPF and PPG guidance. In line with these consultation has been carried out with all residents, stakeholders and prescribed bodies. The Council has engaged with the NPG and taken their views into account, however, no suggestions of site allocations were made.
MP, Local Borough, Town or Parish Councillor	
<p>South Warrington Parish Council's Local Plan Working Group consider that the Policy is not sound for the following reasons;</p> <ul style="list-style-type: none"> Much of this site is already committed to development under a permission granted on appeal under ref 2017/31816. The acceptability of the development was however largely predicated on acceptance that the site was mostly previously developed land and that openness to the Green Belt was unduly prejudiced as a consequence. The land to the west now incorporated into the proposed allocation is not previously developed. When added to the permitted Tanyard Fm development, Lymm and Outrington will become joined not just by a ribbon of development on Rushgreen Road but with a bulk of development filling the space between Rushgreen Road and the Bridgewater Canal. This development would be highly visible from the canal and its towpath. 	<ul style="list-style-type: none"> The potential implications of releasing the 'selected sites' from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundary are addressed in the Council's Implications of Green Belt Release Report (August 2021). In respect of the sites around Lymm the conclusion is that their removal from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. Part 6 of the policy specifies that the density should be at an average minimum of 30 dwellings per hectare to reflect the site's location adjacent to open countryside. Whilst, Part 11 of the policy requires development to take account of existing landscape features including trees, ponds, watercourse and the Bridgewater Canal.
<ul style="list-style-type: none"> The permitted development was approved subject to a planning obligation. The provisions of the obligation are different to those expected by the allocation. It is therefore unclear as to whether the expected requirements of any future agreement can be related to the development of all of this allocation. Depending on how development comes forward – there is considerable potential for funding for infrastructure to fall foul of funding arrangements relating to the pooling of developer contributions. 	<ul style="list-style-type: none"> The limit on pooling of S106 contributions has now been removed by recent revised government guidance. The use of Section 106 contributions will be as advised by the relevant infrastructure requirement and service provider which will be reflected in the S106 agreement attached to the site's planning permission.

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<ul style="list-style-type: none"> • Until such time as a new high school is built on the Garden Suburb, it would be necessary to demonstrate that existing high school capacity is sufficient to accommodate increasing demand. 	<ul style="list-style-type: none"> • The policy requires that s106 contributions are made for school places and primary care provision, the Local Planning Authority will be advised by Education and Health Services on where these funds should be directed to.
<ul style="list-style-type: none"> • It is not clear that the land is all in control of owners amenable to development and readily available for development. 	<ul style="list-style-type: none"> • The developers and promoters have indicated that they have control of the allocated site.
<ul style="list-style-type: none"> • The development is likely to increase traffic using Cherry Lane (B5158) to reach junction 20 of the M6. The cumulative impact of proposed allocations has not been taken into account in this regard. No improvement to these junctions is proposed in the IDP. It is indicated that these sites will be brought forward early in the plan period. 	<ul style="list-style-type: none"> • To support the Council's Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable.
<ul style="list-style-type: none"> • Lymm Parish Council are concerned about the effect of the new developments on already busy roads around Lymm. Many HGVs use them ignoring weight limits. There is additional traffic if the motorway is closed and it is considered that air quality is a problem especially at the pinchpoints. There is considerable cynicism amongst residents, which the PC share, about the judgement of the Council's Highways Department over traffic safety issues. There is an over reliance on recorded statistics at the expense of common sense and local knowledge. 	<ul style="list-style-type: none"> • To support the Council's Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. • Part 15 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development.
<ul style="list-style-type: none"> • Lymm Parish Council has concerns about the provision of infrastructure. Whilst, reference is made in the Policies to contributions from developers to both primary and secondary schools, no consideration been given to the ability of the schools to cope with these additional demands. There is not enough capacity in the sewerage system to accommodate the new 	<ul style="list-style-type: none"> • The evidence collated to support the area profiles and options appraisal work prior to the PDO consultation concluded that growth in the order of 10% in the outlying settlements could be accommodated by existing infrastructure provision, with some limited infrastructure enhancements.

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<p>housing. There are a large number of small businesses in Lymm, many of which depend on fast broadband connections. Lymm has slow broadband already and there will not be enough capacity to service the increase in demand.</p>	<p>The final allocation of sites in the outlying settlements has been based on detailed site assessments and infrastructure capacity.</p> <ul style="list-style-type: none"> • Part 19 of the policy recognises the need to make improvements to the water supply and sewerage network. • Part 11 of Policy INF3 in the Updated PSVLP requires all new development to be served by high speed Broadband or to enable its installation at a future date if it is not feasible at the time of the application.
Landowner/Developer	
<ul style="list-style-type: none"> • There is strong support from the developer whose site is proposed to be allocated by Policy OS7. Majornet Ltd & Bellway Homes Supporting Statement confirms the deliverability of site as a whole and ability to deliver a new health care facility. The statement also covers; Green Belt Assessment; site constraints and accessibility; comments on Site Assessment Proforma to demonstrate suitability. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Wallace Land Investment is supportive of the growth planned for Lymm subject to the addition of its proportionate share of the additional housing land requirement resulting from the increase in the flexibility allowance from 10% to 20%. Land for a further 750 homes should be allocated proportionately to the outlying villages of which Lymm should accommodate an additional 310 homes (41%). 	<ul style="list-style-type: none"> • Support noted. • The Council considers that the 10% flexibility allowance that is proposed is sufficient for the housing land supply. Release over and above this limit in the outlying settlements will undermine the spatial strategy, impacting on the Council's regeneration plans and maximising the use of urban sites to deliver new homes.
<ul style="list-style-type: none"> • The Strategic Land Group (SLG) supports the allocation of a new primary health care facility for a minimum of 1,500sqm, as a requirement of Policy OS7 particularly given existing provision in the village. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Majornet Ltd & Bellway Homes do not consider it is appropriate for the Council to require development to take place in accordance with an emerging neighbourhood plan for the purposes of Policy OS7. A draft neighbourhood plan has not been published for public consultation. 	<ul style="list-style-type: none"> • Extensive consultation has been undertaken in respect of the Lymm Neighbourhood Plan. It is likely it will be adopted ahead of the adoption of the Local Plan.
<ul style="list-style-type: none"> • Majornet Ltd & Bellway Homes have raised issues with some of the specific wording of the policy in relation to several issues, that include: 	<ul style="list-style-type: none"> • The policy sets out, in line with other settlement allocations, what parameters are acceptable for the development of this particular

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Summary of Issues Raised	Response
<p>the provision for self-build/custom-build plots; the need for a contribution towards school places; the requirement for 0.99ha open space; the need to demonstrated that there would be no harm to the setting of Tanyard Farmhouse; the need for a surface water strategy and improvements to the water and sewerage network.</p>	<p>allocation. Removal or weakening of the points would weaken the proposal for release of part this site which is in the Green Belt. There is an existing approved application, however the Plan allocation in these circumstances will need to be in line with the new Plan and its revised considerations not to the approved application which was considered under different circumstances and parameters.</p>
<ul style="list-style-type: none"> • There are some developers who consider that the site proposed by Policy OS7 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted site and representations are mostly are on the Green Belt Assessments and housing requirement figures. 	<ul style="list-style-type: none"> • In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The assessment considered the contribution that larger General Areas, individual parcels adjacent to the main urban area and inset settlement boundaries and development sites promoted through the ‘call for sites’ all made to Green Belt criteria. • The Council has produced a detailed assessment of the need for future homes. The Council is planning for a level of homes above the Government’s minimum requirement by providing for an additional 2 years of land in applying a 10% flexibility factor in its land requirement calculation. This has included release of a significant release of land from the Green Belt which will complement development in the existing urban environment.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • However, Historic England suggest a number of modifications to the wording of the policy to ensure that it is better aligned with the NPPF and with the content of the HIA, in summary these are: <ul style="list-style-type: none"> ○ Amend the wording of Paragraph 19 of the policy to read: “Development will be required to preserve and enhance the <u>historic environment, heritage assets and their setting</u>”. 	<ul style="list-style-type: none"> • It is agree that the proposed modifications would strengthen and clarify the policy. The policy has been modified in the Updated PSVLP to incorporate the amendments suggested by Historic England and to take account of the Tanyard Farm site having already received planning permission.

Policy OS7 - Lymm - Rushgreen Road (now Policy OS5 in the updated PSVLP and amended to remove Tanyard Fm)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> ○ Replace the wording of Paragraph 20 of the policy with the following: <u>“Development proposals will be required to be in accordance with the Heritage Impact Assessment for Lymm – Tanyard Farm including the proposed mitigation and enhancement measures.”</u> ○ Delete bullet 20(a) entirely. 	
<ul style="list-style-type: none"> ● Under the heading of Utilities and Environmental Protection, United Utilities recommends an additional policy requirement to require development to assess the impact on the groundwater environment due to the location of the site in a groundwater source protection zone. 	<ul style="list-style-type: none"> ● It is agreed that the proposed modifications would strengthen the policy. The policy has been modified in the Updated PSVLP to require development proposals to assess the impact on the groundwater environment and incorporate appropriate mitigation measures in accordance with Policy ENV8.
Other	
<ul style="list-style-type: none"> ● Cheshire Wildlife Trust (CWT) consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation. 	<ul style="list-style-type: none"> ● The Natural Environment Section (Part 12) of the policy has been modified to make reference to the need for the development to deliver an increase in biodiversity in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> ● CWT advise that the mature native hedgerows, many of which contain mature trees, within this site are also classified as habitats of principal importance. In order to comply with proposed Policy DC4 and paragraph 174(b) of the NPPF habitats of principal importance (priority habitats) must be avoided, mitigated for, or as a last resort compensated for i.e. the mitigation hierarchy must be shown to have been applied. Where an allocation contains mature trees, no guidance has been provided on how these should be avoided where possible. 	<ul style="list-style-type: none"> ● Part 13 of the policy make reference to taking account and reinforcing existing hedgerows and trees along the site boundaries. The Natural Environment Section of the policy (Part 11) has been modified in the Updated PSVLP to make reference to the need for the development to assess the impacts on Priority Species and Habitats through the application of the mitigation hierarchy in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> ● The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self- 	<ul style="list-style-type: none"> ● Support noted. ● WBC maintain a register of individuals and groups, who are seeking to acquire serviced plots of land in the authority’s area in order to build

Policy OS7 - Lymm - Rushgreen Road (now Policy OS5 in the updated PSVLP and amended to remove Tanyard Fm)	
Summary of Issues Raised	Response
<p>build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites.</p>	<p>houses for those individuals to occupy as homes, as required by the Self-build and Custom Housebuilding Act 2015.</p>
<ul style="list-style-type: none"> • The Trans Pennine Trail requests inclusion during the consultation process as part of the Lymm developments. This policy should note the close proximity of the current TPT. There will be increase footfall that will utilise the TPT as part of these developments. WBC should work with developers regarding future maintenance of the Trail and any diversions needed during works. Accessible sustainable transport routes that also interconnect with the TPT should be provided as part of the intended future developments. The TPT would ask that all facilities are fully accessible and include the needs of cycle storage / charging points and wheelchair / scooter charging stations. 	<ul style="list-style-type: none"> • Parts 15 and 16 of the policy require the development to provide connectivity to existing footpath and cycle network and to make a contribution towards the delivery of improved cycle links to employment opportunities in the town centre and the proposed South East Warrington Employment Area allocation.
<ul style="list-style-type: none"> • There is a disregard for the Green Belt boundaries that were agreed 5 years ago. Lymm and other villages in the borough need to retain their character. Lymm has definitely had its share of new buildings in recent years (Unknown source). 	<ul style="list-style-type: none"> • The potential implications of releasing the 'selected sites' from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundary are addressed in the Council's Implications of Green Belt Release Report (August 2021). In respect of the sites around Lymm the conclusion is that their removal from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt.
<ul style="list-style-type: none"> • Concerns over the infrastructure mainly the extra traffic and air pollution. Rushgreen Road is far too narrow for any extra traffic. 	<ul style="list-style-type: none"> • To support the Council's Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local

Policy OS7 - Lymm - Rushgreen Road (now Policy OS5 in the updated PSVLP and amended to remove Tanyard Fm)	
Summary of Issues Raised	Response
	<p>highway network and the selected sites were considered to be acceptable.</p> <ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report concludes that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys.

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
<p>Residents</p> <ul style="list-style-type: none"> The number of houses proposed for Lymm is too high. The town has increased significantly in size in the last 25 years and the infrastructure cannot cope with more development. In particular the surgeries and schools are already full, and the roads, particularly Whitbarrow Road and Rushgreen Road are at full capacity now, before any further additional demands are put on them. Development will increase traffic congestion. Warrington Road in Statham will see considerable increase in traffic given the two large developments planned for that area. The additional traffic will create more chaos around Statham Primary School, where there are already traffic issues in the morning and afternoon peak times. 	<ul style="list-style-type: none"> The housing requirement is based on planning guidance from the government and is a whole Borough requirement and not specific to one neighbourhood. The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. The Council considers that the number of homes being proposed in Lymm under the Spatial Strategy will ensure the character of Lymm is maintained. The Council’s assessment of infrastructure demonstrates that early delivery of homes can be achieved, subject to the expansion of one of Lymm’s primary schools and the provision of a new health facility. The Updated PSVLP has however removed the Massey Brook Lane allocation as the site promoter and land owners have confirmed the site is no longer available and have requested that the site is withdrawn from the Local Plan process. This will reduce the number of homes proposed in Lymm by 60. Parts 15 to 17 of the allocation policy in the updated PSVLP require a full transport assessment and transport improvements to support the development. The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care (Parts 7 ,8 and 10). The development will be expected to provide

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
	<p>minimum open space/equipped play in line with Council standards (Part 9).</p>
<ul style="list-style-type: none"> The bulk of the proposed housing is on the north side of Lymm. Travelling out of Lymm from these locations is not easy due to the Manchester Ship Canal to the north and the village centre with its narrow 20 mph residential streets and the Bridgewater Canal to the south. 	<ul style="list-style-type: none"> To support the Council’s Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable.
<ul style="list-style-type: none"> Any necessary infrastructure should be built before the houses, not afterwards. There are no guarantees that developers will contribute to the costs/provision of any necessary infrastructure/facilities when they are needed. 	<ul style="list-style-type: none"> The phasing of the infrastructure will be the subject of a S106 Agreement at the planning application stage.
<ul style="list-style-type: none"> WBC ignored the government’s own five purposes for Green Belt. The proposal will not contribute to urban regeneration and will contribute to settlements merging. The very special circumstances necessary justify release of GB not been demonstrated. 	<ul style="list-style-type: none"> The potential implications of releasing the ‘selected sites’ from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundary are addressed in the Council’s Implications of Green Belt Release Report (August 2021). In respect of the sites around Lymm the conclusion is that their removal from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the outlying settlements. In accordance with paragraph 141 of the NPPF, the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. The requirement to ensure that sufficient land is provided to meet Warrington’s development needs; that housing affordability is addressed; and the

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
	creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'.
<ul style="list-style-type: none"> • The plan leads to encroachment on the countryside and will destroy the wildlife that inhabit the area including badgers and newts. 	<ul style="list-style-type: none"> • Policy DC4 expects that ecological surveys of the site take place and where habitat is lost that there is appropriate compensatory provision and a net gain. The survey should consider any protected and other wildlife in line with the Wildlife and Countryside Act provisions. Part 11 of the policy requires that the layout of the development should take account of existing landscape feature including its contribution to the Mersey Forest (the local delivery framework for the Northern Forest).
<ul style="list-style-type: none"> • The plan obliterates the setting and special character of the historic town of Lymm by making it another building site with lots of new quick build characterless houses. 	<ul style="list-style-type: none"> • The development will be at low density of 30 dwellings per hectare and in line with Council's Design and Construction SPD which promotes design that reflects the character of an area. In addition, Part 2 of the policy specifies that the development should be in-line with Lymm Heritage and Character Assessment and the emerging neighbourhood plan.
<ul style="list-style-type: none"> • OS8 will harm the distinctive identity and the rural setting of Statham Lodge heritage site. 	<ul style="list-style-type: none"> • The Heritage Impact Assessment referred to in Part 23 of Policy OS4 in the updated PSVLP1 incorporates mitigation and enhancement measures (screening and height restrictions to buildings) to protect the setting of Statham Lodge Hotel.
<ul style="list-style-type: none"> • The plan actually impedes urban regeneration, by discouraging the recycling of derelict land because it shows potential developers that it is acceptable to buy Green Belt land and keep pushing to build houses on it. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF, the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of brownfield sites, optimised the density of development on town centre sites and discussing with neighbouring authorities the possibility that they could accommodate some of Warrington's needs, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release.

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The high value of houses planned in the Lymm area will not be affordable for local families they will probably be bought up by commuters, we need more affordable houses. 	<ul style="list-style-type: none"> • Part 4 of the policy requires the provision of affordable housing in line with the requirements of Policy DEV2. Policy DEV2 looks to provide a mix of housing types on sites, together with different methods of purchase. New development in south Warrington will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council’s housing waiting list. A third will be for low cost home ownership, of which the majority will be ‘First Homes’ specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers.
<ul style="list-style-type: none"> • Lymm has an extremely active Neighbourhood Plan Group (NPG) which has been working very hard with the local community, it is very disappointing that this Group has not been involved in the selection of possible sites for housing. 	<ul style="list-style-type: none"> • The Local Plan preparation and consultation process is set out and prescribed by Planning and Compulsory Purchase Act 2004, the NPPF and PPG guidance. In line with this consultation has been carried out with all residents, stakeholders and prescribed bodies. The Council has engaged with the NPG and taken their views into account, however, no suggestions of site allocations were made.
<ul style="list-style-type: none"> • Policy OS6 does not meet General Principle 1 of Policy ENV2, as there are areas of lower risk of flooding that should be considered for development. 	<ul style="list-style-type: none"> • The Site Assessment process considers the performance of each site with regard to a range of issues not just flood risk. Whilst, a small part of the western edge of the site falls within Flood Zone 2, the vast majority of the site is within Flood Zone 1 (Revised EA Flood Mapping - April 2021). • Overall the site performed well against the assessment criteria. • In line with national guidance and ENV2 a full flood risk assessment will be required that meets sequential testing criteria and details any mitigation measures as required by national guidance and policy.
<i>MP, Local Borough, Town or Parish Councillor</i>	
South Warrington Parish Council's Local Plan Working Group consider that the Policy is not sound for the following reasons;	

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> the site encroaches into open countryside which currently provides an attractive and distinct rural edge to the village. The site slopes gently upwards to the north, is prominent in views approaching Statham from the west and provides an attractive landscaped setting for the north western edge of Lymm. no information is provided to ensure that there is sufficient capacity and space to extend local primary and secondary schools or health facilities. Statham Lodge is a grade II listed building. The setting of the building will be adversely affected. 	<ul style="list-style-type: none"> The Council has assessed a range of spatial options based on varying levels of development within the outlying settlements. The Council considers that incremental growth in the outlying settlements can be accommodated predominantly within the capacity of existing infrastructure - subject to a level of expansion which can be delivered through planning obligations from new development – and without having a significant detrimental impact on the character of individual settlements Parts 7 and 8 of the policy require that financial contributions are made for school places and primary care provision. The Local Planning Authority will be advised by Education and Health Services on where these funds should be directed and to what. Part 23 of the policy requires a mitigation strategy to be provided in line with the Heritage Impact Assessment to protect the setting of Statham Lodge.
<ul style="list-style-type: none"> the site is less than 350m from the edge of the elevated section of the M6 as it crosses Thelwall viaduct. No submissions are made to demonstrate that this specific allocation can be considered acceptable in terms of air quality and noise given this location. 	<ul style="list-style-type: none"> The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process. The proposed employment and residential allocations in the Plan are all dependent on infrastructure improvements to either the Strategic and/or Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts. The Local Plan Air Quality Modelling Report concludes that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
	implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised.
<ul style="list-style-type: none"> • Lymm Parish Council are concerned about the effect of the new developments on already busy roads around Lymm. Many HGVs use them ignoring weight limits. There is additional traffic if the motorway is closed and it is considered that air quality is a problem especially at the pinchpoints. There is considerable cynicism amongst residents, which the PC share, about the judgement of the Council's Highways Department over traffic safety issues. There is an over reliance on recorded statistics at the expense of common sense and local knowledge. 	<ul style="list-style-type: none"> • To support the Council's Local Plan, a new transport model has been developed. The Warrington Multi Modal Transport Model (WMMTM) (2021) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. • Part 15 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development.
<ul style="list-style-type: none"> • Lymm Parish Council has concerns about the provision of infrastructure. Whilst, reference is made in the Policies to contributions from developers to both primary and secondary schools, no consideration been given to the ability of the schools to cope with these additional demands. There is not enough capacity in the sewerage system to accommodate the new housing. There are a large number of small businesses in Lymm, many of which depend on fast broadband connections. Lymm has slow broadband already and there will not be enough capacity to service the increase in demand. 	<ul style="list-style-type: none"> • Policy ENV3 (Utilities and Communications) specifies at Part 2 that the Council will support the installation of existing and emerging telecommunications technology in new residential and employment development, to improve the connectivity of the population, support business growth and facilitate home working and Part 3 states developers will be required to work with the Council and appropriate providers to deliver the necessary physical infrastructure and networks as an integral part of all new developments, taking into account the need to 'future proof' development to accommodate emerging technologies. • Parts 18 to 19 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
Landowner/Developer	
<ul style="list-style-type: none"> • Gladman Developments Ltd support the allocation. The site is not subject to any technical, landownership or viability constraints that would preclude development. The site is being actively promoted on behalf of the landowners and can be delivered in the short term. All of 	<ul style="list-style-type: none"> • Support noted. • It is acknowledged that both sites are under the control of the same site promoter/owner who has indicated a desire to bring them forward

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
<p>the policy requirements within OS6 can be met, including required planning obligations (subject to meeting requirements of NPPG para 56 and relevant CIL regulations). As presently drafted the requirements for OS6 and OS8 envisage that the two allocations will come forward independently in respect of open space requirements. It is suggested that the overall policy could be amended to reflect the possibility that the two sites may come forward as a single proposal.</p>	<p>jointly. The updated PSVLP has amalgamate Policies OS6 and OS8 into one new policy OS4.</p>
<ul style="list-style-type: none"> Wallace Land Investment is supportive of the growth planned for Lymm subject to the addition of its proportionate share of the additional housing land requirement resulting from the increase in the flexibility allowance from 10% to 20%. Land for a further 750 homes should allocated proportionately to the outlying villages of which Lymm should accommodate an additional 310 homes (41%). 	<ul style="list-style-type: none"> The Council considers that a 10% benchmark allowance provides sufficient flexibility for the housing land supply. Release over and above this limit in outer settlements will undermine the spatial strategy and impact on regeneration plans and undermine the maximisation of urban sites and their capacity to deliver new homes.
<ul style="list-style-type: none"> Anwyl Land Ltd Our Client support in principle the need for the allocation of sites within outlying settlements to boost homes within the local area. However, it remains unclear how or why only an “incremental growth” option for each outlying settlement has been calculated or defined. It appears to be based on a candidate site submission rather than assessing what the needs of each settlement actually are. This is not a justified or a sound approach. It is Anwyl Land Ltd view that the amount of housing proposed within these outlying settlements is not sufficient and further land release is required, as currently less than 6% of the Borough’s overall Plan period housing requirements will be delivered within the outlying settlements. 	<ul style="list-style-type: none"> The Council has considered a range of alternatives for Green Belt release including a more release around settlements, this was considered harder to deliver and mitigate for re the impacts on infrastructure. It is considered that the areas of Green Belt release proposed provide the most sustainable way of meetings Warrington’s development needs as part of the Plan’s overall Spatial Strategy whilst ensuring the long term integrity of Warrington’s Green Belt. The majority of new housing is in large Green Belt release that bring within corresponding amounts of new and improved infrastructure.
<ul style="list-style-type: none"> There are some developers who consider that the site proposed to be allocated by Policy OS8 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted site and representations are mostly are on the Green Belt assessments and housing requirement figures. 	<ul style="list-style-type: none"> In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The assessment considered the contribution that larger General Areas, individual parcels adjacent to the main urban area and inset settlement boundaries and development sites promoted through the ‘call for sites’ process make to the 5 purposes of Green Belt.

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • In determining Warrington’s housing requirement, the Council has followed the Government’s Standard Housing Methodology and associated Planning Practice Guidance. The Updated PSVLP proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. • The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council’s economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period. • The Council is confident that setting the housing requirement of the Plan to the minimum requirement under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the previous proposed target.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment subject to a few minor amendments to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk. Paragraph 20 should be amended to read: “Development will be required to preserve and 	<ul style="list-style-type: none"> • Support noted. • It is agreed that the proposed modifications would strengthen and clarify the policy. The Historic Environment section of the policy (Part 22) has been revised in the updated PSVLP as outlined by Historic England.

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)	
Summary of Issues Raised	Response
<p>enhance the <u>historic environment, heritage assets and their setting</u>". Paragraph 21 should be amended to read: "Development proposals will be required to be in accordance with the Heritage Impact Assessment for Lymm – Warrington Road including the proposed mitigation and enhancement measures." It is recommended that Bullet 21(a) is deleted entirely to ensure that it is consistent with the NPPF and the content of the HIA. The suggested change to Para 21 would mean there is no need to include additional detail.</p>	
Other (5):	
<ul style="list-style-type: none"> Cheshire Wildlife Trust (CWT) consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation. 	<ul style="list-style-type: none"> It is acknowledged that the policy does not reflect the need to achieve net gains in biodiversity. The Natural Environment section of the policy (Part 12) has been revised in the updated PSVLP to make reference to the need for the development to deliver a measurable net gain in biodiversity in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites. 	<ul style="list-style-type: none"> Support noted. WBC maintain a register of individuals and groups, who are seeking to acquire serviced plots of land in the authority’s area in order to build houses for those individuals to occupy as homes, as required by the Self-build and Custom Housebuilding Act 2015.
<ul style="list-style-type: none"> The Trans Pennine Trail requests inclusion during the consultation process as part of the Lymm developments. This policy should note the close proximity of the current TPT. There will be increase footfall that will utilise the TPT as part of these developments. WBC should work with developers regarding future maintenance of the Trail and any diversions 	<ul style="list-style-type: none"> Request noted. Parts 15 to 17 of the policy require a full transport assessment and a package of transport improvements to support the development, with particular reference to cycling and walking routes.

Policy OS8 - Lymm - Warrington Road (now Policy OS4 in the updated PSVLP and amalgamated with Lymm – Pool Lane)

Summary of Issues Raised	Response
needed during works. Accessible sustainable transport routes that also interconnect with the TPT should be provided as part of the intended future developments. The TPT would ask that all facilities are fully accessible and include the needs of cycle storage / charging points and wheelchair / scooter charging stations.	

Policy OS9 – Winwick (now Policy OS6 in the updated PSVLP)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> It has not been demonstrated to be the most suitable and appropriate site for housing. It's moderate/strong Green Belt function and the site's significant landscape sensitivity; the impact the proposal will have on the setting of the Historic Battlefield; the technical constraints affecting the site (including landfill and pylons); the limitations it would put on the potential future expansion of the United Utilities waterworks. Part of SHLAA site ref: 3334 is considered to be a more appropriate and justified site for release from the Green Belt having regard to site constraints and the site's Green Belt function. 	<ul style="list-style-type: none"> In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt Assessment has taken place. The assessment considered the contribution that larger General Areas, individual parcels adjacent to the main urban area and inset settlement boundaries and development sites promoted through the 'call for sites'. The site performed well against the objectives of the Local Plan, the NPPF, the Local Plan's Sustainability Appraisal and was found to make a moderate contribution to Green Belt.
<ul style="list-style-type: none"> The allocation of any site(s) in Winwick is unnecessary as Warrington is proposing to go above the minimum number of houses needed to meet government requirements. 	<ul style="list-style-type: none"> In determining Warrington's housing requirement, the Council has followed the Government's Standard Housing Methodology and associated Planning Practice Guidance. The Updated Proposed Submission Version Local Plan (PSVLP) proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the previous Proposed Submission Version Local Plan.
<ul style="list-style-type: none"> There are health concerns in respect of the future occupants of the site due to the Overhead High Voltage Electric pylon route through the middle of the site. 	<ul style="list-style-type: none"> The Council has taken into consideration National Grid's guidance on the proximity of housing development to powerlines when considering whether to allocate the site.
<ul style="list-style-type: none"> The proposals will impact on local infrastructure and services. The school is already oversubscribed. There is no doctors, dentists or post office. The local highway network is already congested. Waterworks lane is used as a "cut through", this road is busy with fast moving traffic at all times of the day, at peak this will have a massive impact on travel times. It is very narrow and unsuitable to be used as an access road. The village already struggles to cope with school drop off, roads are congested, car parking is chaotic, lots of children walking the streets. The cumulative impact on development in surrounding areas will have a significant 	<ul style="list-style-type: none"> To support the Council's Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable.

Policy OS9 – Winwick (now Policy OS6 in the updated PSVLP)	
Summary of Issues Raised	Response
<p>impact on the highway network in/around Winwick (there are plans to develop Peel Hall, to lose the livery at Delph Lane, and plans (by St Helens) to emaciate a massive area of green belt land between Newton, Lowton and Winwick to create an enormous distribution hub).</p>	<ul style="list-style-type: none"> • Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. As part of the provision transport measures cycling and walking routes will be required to connect with existing networks. • The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity. The development will be expected to provide minimum open space/equipped play in line with Council standards.
<ul style="list-style-type: none"> • Concerned about air pollution and worried about the local wildlife being displaced. 	<ul style="list-style-type: none"> • The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process. The Local Plan Air Quality Modelling Report concludes that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. • Policy DC4 seeks to protect priority species and habitats on development sites and achieve a net gain in biodiversity in line with section 40 of the Natural Environment and Rural Communities Act and the NPPF (2019 update) which indicates that in delivering sustainable development local authorities should enhance as well as protect biodiversity and natural habitats.
<ul style="list-style-type: none"> • Policy OS9 does not accord with paragraphs 71 and 72 of the NPPF. It conflicts with Paragraph 72 as all the subsections of 72(a) to 72(e) must be satisfied. Therefore OS9 must satisfy paragraph 71 footnote 33 and footnote 34. This is because Policy OS9 is stated to be for young starter homes of affordable and self-build basis. 	<ul style="list-style-type: none"> • The Council considers it has met this requirement. The site is not exclusively for entry level and starter homes. A range of housing is specified for the site (Part 2), including specialist housing, family housing and provision for older people. In addition, Part 3 of the policy requires the provision of 30% affordable housing in line with Policy DEV2.
MP, Local Borough, Town or Parish Councillor	

Policy OS9 – Winwick (now Policy OS6 in the updated PSVLP)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Winwick Parish Council object to the allocation on the basis that the local road network is already very busy and in practice almost all trips from or to the site would inevitably be car-based. Winwick is a small self-contained community, the village itself cut off from the wider area of Warrington by the huge physical and psychological severance effect of the M62 and the need to cross Junction 9. It has a reasonable bus service but the precipitous decline in patronage (40% in 6 years) suggests it would be unwise to base future development patterns on availability of bus services. Whilst, the site is located within reasonable distances from both Warrington (about 5km) and Newton-le-Willows (about 3km) rail stations, slow and inconvenient bus links and the general hostility of the area to walking and cycling suggests that any rail travel would still involve local traffic generation. 	<ul style="list-style-type: none"> To support the Council’s Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable. Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. As part of the provision transport measures cycling and walking routes will be required to connect with existing networks.
<ul style="list-style-type: none"> Winwick Parish Council consider that there is no evidence to suggest that further houses in Winwick from a national volume house builder would either increase housing choice or support the vitality and viability of local services. 	<ul style="list-style-type: none"> The policy specifically details the requirement to provide a range of housing tenures, types and sizes (Part 2); and the provision of 30% affordable housing (Part 3). The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches/primary care capacity and the delivery of a minimum open space/equipped play in line with Council standards (Parts 6 to 9).
<ul style="list-style-type: none"> Winwick Parish Council oppose this allocation on the basis that the site makes a major contribution to Green Belt purposes. The Green Belt Assessment suggests that parcel CR4 makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to one, and no contribution to two giving a Moderate contribution overall. This is the same assessment as parcel CR5, which comes out with a ‘Strong Contribution’. Only subjectivity could explain why CR4 has not been given a ‘Strong Contribution’ too, and we think the assessment should be reviewed and updated. 	<ul style="list-style-type: none"> In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt assessment has taken place. The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The parcels were both assessed in accordance with the methodology but because different parcels of land contain different features this can give rise to different results.
Landowner/Developer	

Policy OS9 – Winwick (now Policy OS6 in the updated PSVLP)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • There are some developers who consider that the site proposed to be allocated by Policy OS9 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted site and representations are mostly are on the Green Belt assessments and housing requirement figures. 	<ul style="list-style-type: none"> • In order to assist amending the detailed Green Belt boundaries a robust and comprehensive Green Belt Assessment has taken place. The assessment considered the contribution that larger General Areas, individual parcels adjacent to the main urban area and inset settlement boundaries and development sites promoted through the ‘call for sites’. The site performed well against the objectives of the Local Plan, the NPPF, the Local Plan’s Sustainability Appraisal and was found to make a moderate contribution to Green Belt. • The Council has produced a detailed assessment of the need for future homes, employment land, and retail and leisure uses. The Council is planning for a level of homes above the Government’s minimum requirement by providing for an additional 2 years of land in applying a 10% flexibility factor in its land requirement calculation. This has included release of a significant release of land from the Green Belt which will complement development in the existing urban environment.
<ul style="list-style-type: none"> • Satnam Millennium Ltd consider that all the development north of M62 will put additional pressure onto J9 of the M62 and that this must be taken into account in any mitigation scheme agreed for the M62 junction 9. The plan should set out the requirement for a mechanism for the non-green belt site at Peel Hall and these sites to share the costs of that mitigation scheme. 	<ul style="list-style-type: none"> • Part 14 (c) of the policy allows for necessary network improvements as identified by a Transport Assessment. Highways England are responsible for the motorway network and any advice from them will be taken into consideration.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England considers that the Council is able to demonstrate through its evidence base (Heritage Impact Assessments) that the principle of development is acceptable in terms of its impact on the historic environment. • However, Historic England suggest a number of modifications to the wording of the policy to ensure that it is better aligned with the NPPF and to ensure consistency with the content and application of the HIA and to appropriately deal with the heritage asset at risk. In summary these are: 	<ul style="list-style-type: none"> • Support noted. • It is agree that the proposed modifications would strengthen and clarify the policy. The Historic Environment section of the policy (Part 22) has been revised in the updated PSVLP as outlined by Historic England.

Policy OS9 – Winwick (now Policy OS6 in the updated PSVLP)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> ○ Amend the wording of Para 17 of the policy to read: “Development will be required to preserve and enhance the <u>historic environment, heritage assets and their setting</u>”. ○ Amend the wording of Para 18 of the policy to read: “Development proposals will be required to be in accordance with the Winwick Heritage Impact Assessment for including the proposed mitigation and enhancement measures”. ○ Also, it is recommended that Bullet 18(a) is deleted entirely to ensure that it is consistent with the content of the HIA and replaced with a new paragraph 19 to read as follows: “Development proposals will be expected to conserve and enhance the historic significance, appearance and integrity of and the ability to understand and appreciate the setting of the Battle of Winwick”. This needs to be reflected in the HIA. 	
<ul style="list-style-type: none"> ● United Utilities have concerns when new housing is in close proximity to significant assets. Site reference OS9 Winwick is adjacent to Winwick Service Reservoir. The site is also in GWPZ’s 1&2 and our strong preference is for development to take place outside of these Zones. All UU assets will need to be afforded due regard and the Council should be aware that serious complications could arise because significant existing infrastructure passes through the proposed allocation. It is essential that constructive discussions between United Utilities, the Local Planning Authority and the applicant take place if the scheme is progressing further. If the Council are minded to continue with this allocation, UU recommend that a number of criteria be added to the Policy (set out in full in representation). 	<ul style="list-style-type: none"> ● The Council have engaged with United Utilities and agreed a number of policy amendments. The Utilities and Environmental Protection section of the policy has been modified, as outlined in UU’s letter dated 17th June 2019, in the updated PSVLP.
Other	
<ul style="list-style-type: none"> ● Support of development in Winwick. However, infrastructure such as traffic and schools needs to be addressed and, concern expressed about the pylons that currently cross the site and health implications associated 	<ul style="list-style-type: none"> ● Support noted. ● The Council has taken into consideration National Grid’s guidance on the proximity of housing development to powerlines when considering

Policy OS9 – Winwick (now Policy OS6 in the updated PSVLP)	
Summary of Issues Raised	Response
with these. It is considered that they should be removed prior to any development.	whether to allocate the site. Part 15 of the policy requires the powerlines to be taken into account in the design if the development.
<ul style="list-style-type: none"> Cheshire Wildlife Trust (CWT) consider that the brief policy guidance relating to the natural environment for this allocation is wholly inadequate as it fails to address that Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019) so this should be reflected in the published guidance for the development of this allocation. 	<ul style="list-style-type: none"> In the updated PSVLP the Natural Environment section of the policy (Part 11) requires a scheme for measurable biodiversity net gain to be demonstrated using the Defra Metric in accordance with the requirements in Policy DC4.
<ul style="list-style-type: none"> The National Custom & Self Build Association (NaCSBA) support the requirements in policies relating to the site allocations identified within the emerging plan for specific provision to be made for self-build/custom-build plots. NaCSBA is content that due to the number of allocated sites identified within the plan on which self-build plots will be delivered, that further self-build policies will not be required to meet the needs of those wishing to build their own home. However, it is important that WBC do understand the level of demand so as not to under deliver self-build opportunities on these sites. 	<ul style="list-style-type: none"> Support noted. WBC maintain a register of individuals and groups, who are seeking to acquire serviced plots of land in the authority’s area in order to build houses for those individuals to occupy as homes, as required by the Self-build and Custom Housebuilding Act 2015.
<ul style="list-style-type: none"> The development at Winwick will not impact the Trans Pennine Trail (TPT) but the note of walking and cycling infrastructure is welcomed. The TPT request that all facilities are fully accessible and include the needs of cycle storage/charging points and wheelchair/scooter charging stations. 	<ul style="list-style-type: none"> Comments noted.

Policy M1 - Monitoring and Review Policy	
Summary of Issues Raised	Response
Residents	
• None	•
MP, Local Borough, Town or Parish Councillor	
• None	•
Landowner/Developer	
<ul style="list-style-type: none"> • Agree with the general principle of Policy M1 for local plan monitoring and review. However, to avoid the requirement for a full Green Belt Review within the lifetime of the Local Plan, recommends that a 20% flexibility allowance is added to the assessment of the housing land requirement, resulting in further allocations in the outlying villages and the Garden Suburb for a further 1,890 homes. In addition, recommends the safeguarding of additional land which could be released for development within the plan period. Proposes that the Land to the South of Hatton Lane, Stretton is removed from Green Belt and designated as safeguarded land, to provide for housing land in line with Policy W1, should monitoring reveal that housing completions fall below those set out in the Housing Trajectory and the requirement for a 5 year effective housing land supply is not maintained. 	<ul style="list-style-type: none"> • The NPPF recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, including significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (para 72). This is reflected in the results of the spatial options assessment and SA/SEA which has informed the Plan’s Spatial Strategy. The Council recognises that the Main Development Areas will have relatively long lead in times. As such the Plan proposes a stepped trajectory, which is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The Spatial Strategy already ensures additional sites will come forward from the proposed Green Belt release in the outlying settlements early in the Plan Period. The Council recognises a degree of risk associated with a large proportion of development being proposed within the 4 Main Development Areas. The Updated PSVLP (2021) allows for a flexibility in the land supply which equates 13.5%, with a long term supply of housing beyond the Plan Period, there is also the potential for further delivery should the housing market be able to deliver at a higher rate. The updated PSVLP also includes an additional site at Thelwell Heys which will deliver additional homes early in the Plan Period, complementing the larger development sites without having a material impact on the functioning of Warrington’s Green Belt. Therefore, the Council considers that there is sufficient flexibility in the Plan to not require a full Green Belt review within the life time of the Plan.

Policy M1 - Monitoring and Review Policy	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Support the inclusion of a monitoring and review policy however the policy is not considered to be sound as it is not justified or consistent with national policy. The Council should consider alternative measures if delivery falls below expected levels, such as the granting of planning permission for unallocated sites in sustainable locations. Specific targets should be included. 	<ul style="list-style-type: none"> • The Council considers the monitoring framework in Policy M1 is sufficiently robust.
<ul style="list-style-type: none"> • The wording of any review mechanism needs to be clear, easily understandable, effective and enforceable. Wording from the North West Leicestershire Local Plan (adopted in 2017) is provided as an example. Amend to provide greater clarity on when a review will be required and on what basis 	<ul style="list-style-type: none"> • The Council considers that the wording is sufficiently clear.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • Support the Council in including a policy highlighting the actions to be taken if housing is not delivered. However, it is considered that the Council may also want to consider alternate measures such as the granting of planning permission for unallocated sites in sustainable locations. The Council may also want to consider how this policy sits with the Housing Delivery Test and the presumption in favour of sustainable development as set out in the NPPF 2019. 	<ul style="list-style-type: none"> • The Council considers the monitoring framework in Policy M1 is sufficiently robust.
<ul style="list-style-type: none"> • Appendix 2 sets out the Monitoring Framework, the HBF supports the use of appropriate targets, however we would also recommend that specific monitoring triggers are introduced to this framework, along with time-bound actions. In the case of the housing targets this is likely to be similar to Policy M1. This will help to ensure that action will be taken when a target is not met, and a policy needs reviewing. 	<ul style="list-style-type: none"> • The Council considers the monitoring framework in Policy M1 is sufficiently robust.
<ul style="list-style-type: none"> • Part of the monitoring exercise should be to include counter devices for walking and cycling infrastructure. The usability of the existing and new schemes data will be useful to monitor usage and trends. 	<ul style="list-style-type: none"> • Comments noted.

Local Plan as a Whole	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The Council has employed at significant cost a number of high powered consultancies to help it fulfil its obligations in developing its various plans and support documents. Therefore, the plans and support documents are by necessity written with a bias to reflect the desires of the Council and various stakeholders. 	<ul style="list-style-type: none"> The contents of the evidence base documents are guided by the NPPF and supporting planning practice guidance and are required as part of the Local Plan preparation.
<ul style="list-style-type: none"> The Green Belt underpins Grappenhall's historic setting reflected in its Conservation Area Status. 	<ul style="list-style-type: none"> The aim of the Green Belt Assessment is to provide an objective, evidence-based and independent assessment of how Warrington's Green Belt contributes to the five purposes of Green Belt set out in national policy, one of which is to preserve the setting and special character of <u>historic towns</u>. It is not the purpose of the Green Belt Assessment to assess the impact on individual conservation areas. The impact on individual conservation areas, both inside and outside of the borough have been assessed through the Heritage Impact Assessments for the proposed allocation sites, where appropriate. However, it should be noted that the reduction in the amount of Green Belt released in the Updated PSVLP (2021), includes land in south Warrington that covers the Grappenhall Village Conservation Area.
<ul style="list-style-type: none"> Warrington has an ageing population. 	<ul style="list-style-type: none"> The Council's Local Housing Needs Assessment (LHNA) (2021) considers all of Warrington's housing needs and has identified the need for around 25% of new homes in Warrington to be provided to accommodate older persons and for an additional 1,053 bedspaces within extra care facilities (LHNA Table 48). Whilst the need for bedspaces needs to be addressed over the plan period, the Council's overall strategy seeks to encourage more independent living, where this is appropriate. Policy DEV2, seeks to help address this need by requiring all new housing to be adaptable and accessible and in residential developments of 10 dwellings or more for housing for older people to be provided (Parts 15

Local Plan as a Whole	
Summary of Issues Raised	Response
	to 19). These requirements for M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings) will have a positive impact in meeting older persons needs over the plan period. In addition, the Main Development Areas also have specific requirements to make provision for specialist housing for the elderly.
<ul style="list-style-type: none"> • Developers via the Local Enterprise Partnership (LEP) are influencing the nature and extent of the Plan. 	<ul style="list-style-type: none"> • The Council with the other Local Authorities in Cheshire are represented on the LEP Board and sub-committees and work in partnership with the private sector. Private sector partners include major companies and employers in a wide range of industry sectors who are committed to the sustainable development of the whole sub-regional economy. • The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2021) using data which post-dates the EU Brexit referendum. The Council no longer considers the previous scale of jobs growth and economic ambitions to be realistic. However, the Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations.
<ul style="list-style-type: none"> • A parliamentary bill should be passed to change the Ship canal into a barge canal so more bridge crossing can be built as no extra height and swing requirements would be needed. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not required to support development in the Plan Period, it may be a requirement in the longer term. As such the Local Transport Plan (LTP4) identifies a specific work stream to begin the options assessment process for a new crossing within the first 5 years following its adoption.
<ul style="list-style-type: none"> • No plans to encourage a switch to electric cars. 	<ul style="list-style-type: none"> • The Updated PSVLP (2021), is through policy INF1 (Sustainable Travel and Transport), encouraging the provision of charging points in development schemes which will encourage a switch to electric cars. Part 1(c) of the policy states that developments should 'Provide infrastructure for the charging of plug-in and other ultra-low emission vehicles, in line with the Council's Parking Standards SPD (2015);'

Local Plan as a Whole	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Object to the loss of agricultural land 	<ul style="list-style-type: none"> • The quality of agricultural land was taken into account in the Council's spatial option and site assessment processes and in the Plan's Sustainability Appraisal. The Council has sought to minimise the loss of the best and most versatile agricultural land. • Since the PDO stage and previous 2019 PSVLP consultation, the amount of land being proposed to be released from the Green Belt, the majority of which is agricultural land, has reduced by 6% and now represents 5% of the Green Belt land in the Borough. This equates to the loss of 580ha of Green Belt land, as opposed to the previous figure of 1,210ha.
<ul style="list-style-type: none"> • Negative impact on wildlife. 	<ul style="list-style-type: none"> • The Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on the environment including impacts on wildlife habitats. • A number of the Local Plan policies include specific provision to reduce and mitigate the impacts of development and following comments from Natural England and changes in government guidance and will require improvements and gain to biodiversity when it is affected by development proposals.
<ul style="list-style-type: none"> • Increased light, noise and air pollution. 	<ul style="list-style-type: none"> • Policy ENV8 (Environmental and Amenity Protection) sets out the Council's requirements for development to meet air, noise, and light pollution standards and to provide mitigation measures where appropriate.
<ul style="list-style-type: none"> • Support for the Plan where the Council plans to prevent the import of waste into the Borough 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Support for the Plan where the Council plans to prevent extract peat from the area. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • An Energy Plan should be included and innovation should be encouraged. 	<ul style="list-style-type: none"> • Policy ENV7 (Renewable and Low Carbon Energy) identifies that low or zero carbon power technology which could include solar energy will be encouraged where it satisfies other policy requirements. There is also a requirement for developments to reduce energy needs, provide

Local Plan as a Whole	
Summary of Issues Raised	Response
	renewable sources and for larger residential developments to consider district heating systems.
<ul style="list-style-type: none"> • Warrington should be participating in the Northern Forest and planting trees. 	<ul style="list-style-type: none"> • Policy DC3 (Green Infrastructure) identifies the Northern (Mersey) Forest as a strategic element of green infrastructure and sets out the Council's support to strengthen and continue to improve this asset.
<ul style="list-style-type: none"> • Introduce a tree levy on development sites to support tree planting. 	<ul style="list-style-type: none"> • See above.
<ul style="list-style-type: none"> • Bridge Street is a disgrace, it used to be thriving. 	<ul style="list-style-type: none"> • Policy DEV5 (Retail and Leisure Needs) recognises the importance of the town centre and the support it needs to ensure that it continues as the primary retail and leisure centre of the town, this includes Bridge Street. • Policy TC1 (Town Centre and Surrounding Area) the opportunities and desire to strengthen the town centre including re-development of sites for a variety of purposes, this includes the Time Square and the Cultural Quarter area (including Bridge Street) which is identified for mixed use development
<ul style="list-style-type: none"> • Need to consider empty town centre properties. 	<ul style="list-style-type: none"> • Policy DEV5 (Retail and Leisure Needs) recognises the importance of the town centre and the support it needs to ensure that it continues as the primary retail and leisure centre of the town, this includes Bridge Street. • Policy TC1 (Town Centre and Surrounding Area) identifies the opportunities and desire to strengthen the town centre including re-development of sites for a variety of purposes, this includes the Time Square and the Cultural Quarter area (including Bridge Street) which is identified for mixed use development.
<ul style="list-style-type: none"> • No buildings within 1 mile of a flood plain or nature reserves. 	<ul style="list-style-type: none"> • Guidance has been taken from the Environment Agency and from Natural England on proposed developments and the requirements to meet flood risk and to protect green assets including wildlife and fauna habitats. This is reflected in main policies and policy allocations.
<ul style="list-style-type: none"> • The Council has invested in solar energy but not in Warrington. 	<ul style="list-style-type: none"> • Policy ENV7 (Renewable and Low Carbon Energy) identifies that low or zero carbon power technology which could include solar energy will be encouraged where it satisfies other policy requirements. There is also a requirement for developments to reduce energy needs, provide

Local Plan as a Whole	
Summary of Issues Raised	Response
	renewable sources and for larger residential developments to consider district heating systems.
<ul style="list-style-type: none"> • Disproportionate growth in any settlement especially small settlements, has the potential to place a strain on existing water and waste water infrastructure 	<ul style="list-style-type: none"> • Policy INF3 (Utilities and Telecommunications) puts an obligation on developers to consult with utilities providers and provide a strategy to deliver the necessary infrastructure to support any development.
<ul style="list-style-type: none"> • No justification as to why the Lymm Hall Hotel is not included in the projected growth for Lymm. 	<ul style="list-style-type: none"> • The site was only given consent in December 2018 and was not part of the SHLAA as at 1st April 2018, which was the base date for information to be considered as part of the previous Proposed Submission Version of the Local Plan (PSVLP). It will be considered going forward as a windfall site contributing to housing delivery in the 2021 SHLAA.
<ul style="list-style-type: none"> • No detailed plans for the development of south Warrington, everything is concept and residents can't give full comment as a result. 	<ul style="list-style-type: none"> • The allocation policies provide the key requirements for new development. The development concepts provide an illustration of what development could look like based on these requirements. • More detailed development frameworks are required to be produced for each of the Main Development Areas, prior to the submission of planning applications. They will be subject to further consultation, giving residents an opportunity to comment on more detailed proposals as they take shape. • It should be noted that the Updated PSVLP (2021) is no longer proposing to allocate the South West Urban extension in proximity to Walton and Moore Village or Port Warrington which would have resulted in the loss of part of Moore Nature Reserve. In addition, the South East Warrington Urban Extension is significantly smaller than the previous Garden Suburb allocation.
<ul style="list-style-type: none"> • The allocation for a Gypsy and Traveller site in south Warrington is contrary to current policy. 	<ul style="list-style-type: none"> • The Council's Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA, 2018) provides evidence of the need for new Gypsy and Traveller pitches and Travelling Showpeople plots for the 15-year period from 2017 up to 2032 as required by national policy. The GTAA identified a need for 15 further permanent Gypsy and Traveller pitches between 2017 and 2032 in addition to those consented at the

Local Plan as a Whole	
Summary of Issues Raised	Response
	time of the report being finalised (1 st April 2018). The policy in the previous PSVLP (2019) sought to allocate a site within the then proposed Garden Suburb as there was a site being promoted there that was considered to be suitable, available and achievable and would meet the Council's requirement for providing a supply of deliverable site(s) sufficient to provide at least 5 years worth of supply. This site has now been granted planning permission.
<ul style="list-style-type: none"> • Stockton Heath Library was closed during the consultation process. 	<ul style="list-style-type: none"> • This is correct. However, as part of the consultation material, it was made clear that following the closure for refurbishment of Stockton Heath Library, all Local Plan documents were available to view at alternative locations, those being: <ul style="list-style-type: none"> • Grappenhall Library • Lymm Library • Warrington Library • Council Offices: <ul style="list-style-type: none"> • New Town House • Contact Warrington • Town Hall
<ul style="list-style-type: none"> • No changes in the Plan since the PDO stage. 	<ul style="list-style-type: none"> • All the representations received at the Regulation 18 (PDO) stage were considered by Council Officers, taken into account and informed the previous Regulation 19 Draft Local Plan. • Consideration has been given to comments received on the previous PSVLP (2019) with modifications suggested to policies and allocations, this includes a reduction in Green Belt release and a number of other fundamental changes.
<ul style="list-style-type: none"> • The Plan should be reviewed every 3 years. 	<ul style="list-style-type: none"> • The Plan will be subject to regular review and monitoring, the NPPF requires that plans be reviewed a least once every 5 years.
<ul style="list-style-type: none"> • Consultation has been unfair and vague. 	<ul style="list-style-type: none"> • The consultation on the PSVLP was carried out in line with Planning Regulations and the Council's Statement of Community Involvement.
<ul style="list-style-type: none"> • The Plan fails in its 2011 duty to cooperate with the public. 	<ul style="list-style-type: none"> • see above

Local Plan as a Whole	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Plan is not well thought through and will adversely affect the health of all Warrington. 	<ul style="list-style-type: none"> The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> Hope that the affordable housing is of high quality and mixed with other housing and not separate. 	<ul style="list-style-type: none"> The demand as assessed for affordable homes is based on analysis of 'need' across the borough and the opportunity to widen supply for affordable purchase, social and private rent in all areas for present and future residents of the town.
<ul style="list-style-type: none"> No evidence that staff will be provided for new healthcare facilities. 	<ul style="list-style-type: none"> The Local Plan is a land use document that can support the physical provision of facilities through land allocations, the staffing of facilities is responsible for the commissioning of the public or private provider running and managing the facilities or sector.
<ul style="list-style-type: none"> The Plan is developer led. 	<ul style="list-style-type: none"> The starting point for the Plan was the existing adopted Local Plan, which was subject to extensive consultation. The Vision of the adopted Local Plan has been reviewed, updated and refined taking into account the responses to the two stages of Regulation 18 consultation. Responses have been considered from residents, local representatives, Parish Councils, Statutory Undertakers, residents of other Council areas as well as land owners and developers. The Updated PSVLP (2021) takes on board comments received at the previous Regulation 19 consultation with modifications to policies and reduction of in the release of Green Belt land for development.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> Suggestion that Hatton Lane, Stretton should be removed from the Green Belt. 	<ul style="list-style-type: none"> A comprehensive Green Belt Assessment has been undertaken and this has informed the Plan's spatial strategy and individual allocations. It is not proposed to remove this area from the Green Belt.

Local Plan as a Whole	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> The Council cannot demonstrate a 5 year supply of housing land at the time of 'adoption' therefore the plan is not positively prepared. 	<ul style="list-style-type: none"> The Plan proposes a stepped housing requirement as it is recognised that the Main Development Areas will have relatively long lead in times. This is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The stepped housing requirement will ensure that the Council is able to demonstrate a 5 year housing supply on adoption.
Statutory Consultees	
<ul style="list-style-type: none"> Support for continued economic growth of the Borough. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> Manchester Airport comment that the connectivity benefits to the Airport should be recognised in the plan. 	<ul style="list-style-type: none"> The Council acknowledge the importance of Manchester Airport but do not consider it necessary to amend the Plan. Consultation on transport proposals that may link to surrounding facilities will take place as a matter of course and include both Manchester and Liverpool Airports.
<ul style="list-style-type: none"> Network Rail would welcome the opportunity to discuss whether current rail provision is meeting expectation and whether any action through the plan could improve the network stations for improved transport links, service provision, access or rapid transport provision. 	<ul style="list-style-type: none"> Comment noted.
<ul style="list-style-type: none"> United Utilities wishes to highlight its concerns on sites for development in multi-ownership, sustainable development can be compromised by lack of cooperation across allocations by developers/owners. 	<ul style="list-style-type: none"> United Utilities concerns have been taken into account and modifications to the main policy and policy allocations are now proposed to deal with this aspect.
Other	
<ul style="list-style-type: none"> UKOOG would welcome the inclusion of a statement expressing support for the development of onshore oil and gas, as set out in the NPPF and for the Plan to reflect the Secretary of State's May 23rd 2018 statement in support for the onshore gas and oil business. 	<ul style="list-style-type: none"> Policy ENV5 supports proposals for energy mineral development subject to certain criteria being met.
<ul style="list-style-type: none"> The Council may wish to consider how it would accommodate hydrogen production sites or sites created to facilitate hydrogen production such as gas production sites within the Plan. 	<ul style="list-style-type: none"> Any proposals for such facilities would be considered in line with Policy ENV5 (Energy Minerals). There is no statutory requirement for the authority to identify a site for this purpose.
<ul style="list-style-type: none"> The Trans Pennine Trail (TPT) organisation state that if the trail is re-aligned this should be done at the cost of the developer and the new alignment should enhance visitor experience. 	<ul style="list-style-type: none"> Comments are noted, the policy DC3 (Green Infrastructure) supports the improvement and enhancement of green networks and recognises the Trans Pennine Trail as an asset.

Local Plan as a Whole	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The TPT would remind the Council that they are separate to Sustrans and should be consulted on any impacts on the trail. 	<ul style="list-style-type: none"> • Comment noted.
<ul style="list-style-type: none"> • Multi-modal transport connectivity (rail road and water) would make the west Warrington and Widnes area a commercially attractive proposition for potential businesses. 	<ul style="list-style-type: none"> • Comment noted.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust (CWT) is disappointed that the decision process used for allocations appear not to have adequately taken into account existing biodiversity and green infrastructure. 	<ul style="list-style-type: none"> • The Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on the environment. A number of the Updated PSVLP (2021) policies include specific provision to reduce and mitigate the impacts of development on biodiversity. In addition assessments of the potential effects on nearby European sites of nature conservation importance (Natura 2000 sites) and nationally designated and recognised sites have been considered through the Habitats Regulations Assessment (HRA) process. The initial HRA has now been supplemented with an Updated HRA (August 2021) that takes account of concerns that have been raised on biodiversity and green infrastructure. Relevant policies in the Plan have been amended to take account of recommendations in the HRA.
<ul style="list-style-type: none"> • CWT are of the opinion that the Council should have taken a strategic approach to allocations mapping ecological networks and using this to inform decisions. 	<ul style="list-style-type: none"> • The green infrastructure network has been mapped and has been taken into account in the consideration of spatial options and the selection of individual sites to be allocated.

Policies Map	
Summary of Issues Raised	Response
Residents	
• None.	•
MP, Local Borough, Town or Parish Councillor	
• None.	•
Landowner/Developer	
<ul style="list-style-type: none"> • The Policies Map and its summary (Figure 6) of the Plan do not reflect all consequential changes necessary to ensure a robust Green Belt boundary. At Winwick, the Green Belt boundary departs from reality on the ground, ignoring the development of around 300 dwellings at Delph Park and the construction of a new hospital south of Hollins Lane in the past 20 years. The Green Belt boundary should be adjusted to match reality. 	<ul style="list-style-type: none"> • It is considered that since the adoption of the Local Plan Core Strategy (2014), other than those consequential amendments due to the South East Warrington Urban Extension, that there have not been any other material changes in circumstances that would warrant amendments to the allocation and definition of Inset and Green Belt Settlements.
<ul style="list-style-type: none"> • The Main Map delineates the proposed allocation at Peel Hall with a yellow colour and notation (MD4). The extent of the allocation however is very precise, and includes areas of the surrounding roads, whilst removing land within the body of the site (Peel Hall Kennels, land at The Alders, and Radley Cottage). The boundaries of the notation is, quite simply, taken from the site plan submitted with a previous application, and this level of detail is not required. 	<ul style="list-style-type: none"> • It is considered that the map for Peel Hall (MD4) is appropriate and contains the required level of detail required.
<ul style="list-style-type: none"> • The key should be expanded to include the land to be removed from the green belt in the smaller settlements. 	<ul style="list-style-type: none"> • Land to be removed from the Green Belt is shown on the Map at Figure 6 (Amended Green Belt Boundaries) of the PSVLP.
Statutory Consultees	
• None.	•
Other	
• None.	•

Omitted Sites	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Support for not allocating Site Ref: R18/P2/106 (Land North of Higher Lane, Lymm). The land is considered to be an unsustainable site and unsuitable for development within this plan period and beyond for a number of reasons, including its Green Belt function; accessibility to services; accessibility to public transport; proximity to a designated local wildlife site and the location of a Major Accident Hazard Pipeline on the site. 	<ul style="list-style-type: none"> Support noted.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	
Landowner/Developer	
<ul style="list-style-type: none"> That there is insufficient flexibility in the Plan to allow for lack of delivery of housing on larger sites. Smaller medium sized sites should be allocated that can be delivered quickly and blend in with surrounding settlements without overstretching infrastructure. 	<ul style="list-style-type: none"> The housing methodology guidance was reviewed and reissued in December 2020, the Council has reviewed both its baseline figure and the options for land supply given growth and other factors. It is necessary to include provision for flexibility on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward. The Updated PSVLP (2021) allows for a flexibility in the land supply which equates 13.5%, with a long term supply of housing beyond the Plan Period, there is also the potential for further delivery should the housing market be able to deliver at a higher rate. The flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Updated PSVLP (2021) includes an additional site at Thelwall Heys, which is a greenfield site free from any significant infrastructure requirements that will have the benefit of increasing housing delivery in the early part of the Plan period.
<ul style="list-style-type: none"> Slower than forecast delivery on existing allocations including MD2 Garden Suburb requires that further land should be allocated for Green Belt release 	<ul style="list-style-type: none"> The Council has given detailed consideration to build rates and lead in times relating to the proposed urban extensions, given concerns raised during the previous PSVLP consultation relating to deliverability. Revised rates have been defined based on a review of the Council's housing

Omitted Sites	
Summary of Issues Raised	Response
	<p>monitoring data and engagement with developers promoting sites. Given the number of representations to the previous PSVLP consultation which criticised the Council for using unrealistic build rates, the Council has also compared the rates to the Lichfields' 'Start to Finish' report to ensure they are not unduly optimistic.</p>
<ul style="list-style-type: none"> Where sites are still Green Belt there is challenge to the assessment of the Green Belt contribution that the site makes with counter-arguments that the site makes a weak contribution to Green Belt and should come forward for housing. 	<ul style="list-style-type: none"> The 2016 Green Belt Assessment and 2017 Green Belt Site Assessments provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible.
<ul style="list-style-type: none"> The omitted site is more suitable for development than those allocated within the Plan and can deliver on numbers and required infrastructure (dependent on size of the omitted site). 	<ul style="list-style-type: none"> The methodology for assessing sites was developed by independent consultant's following a review of national guidance and best practice. The assessment approach focused on using a sequential approach with sites prioritised for assessment based on Local Plan spatial priorities and Green Belt Assessment outcomes. Applying a sequential approach to the assessment of sites through the use of major constraints, such as lower performing Green Belt sites as a means of sifting sites is considered to be consistent with national policy. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan's objectives and SA/SEA site assessment criteria to establish that the sites were 'suitable'.
<ul style="list-style-type: none"> Property on the edge of Broomedge a washed over settlement not in the boundary line should be moved into the red line area. 	<ul style="list-style-type: none"> The property is located away from the main settlement edge and stands in its own grounds and is part of open countryside. The Green Belt Assessment (2017) concluded that this plot and the adjoining area of countryside made a strong contribution to the open countryside criteria of the Green Belt and a moderate contribution to Green Belt overall.
<ul style="list-style-type: none"> There is insufficient employment land allocated in Lymm and the proposed Green Belt site should be allocated for this purpose. 	<ul style="list-style-type: none"> The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment needs. It considers that the

Omitted Sites	
Summary of Issues Raised	Response
	<p>areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt.</p>
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •

New Policy Request - Aerodrome Safeguarding	
Summary of Issues Raised	Response
Residents	
• None.	
MP, Local Borough, Town or Parish Councillor	
• None.	
Landowner/Developer	
• None.	
Statutory Consultees	
<ul style="list-style-type: none"> • Manchester Airport Group (MAG): Concerned that the Plan fails to address, or include a policy, related to Aerodrome Safeguarding. By virtue of its importance to the national air traffic system Manchester Airport is an officially safeguarded aerodrome and parts of its safeguarded area fall within the Borough. 	<ul style="list-style-type: none"> • Agree with MAG and a new Policy INF 6 (Aerodrome Safeguarding) has been included in the new updated PSVLP (2021) to ensure the safe operation of Manchester Airport.
Other	
• None.	

Evidence Base - Air Quality Report	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The air quality assessment assumes that increased traffic will be offset by reduced emissions from the vehicle fleet. However, air quality has continued to deteriorate. Reality is therefore not matching predictions which renders the future predictions questionable. 	<ul style="list-style-type: none"> • Warrington Borough Council has been assessing air quality across the Borough for a number of years using a mix of computer modelling and targeted air pollution monitoring. This has given the Council a good understanding of the air quality levels and the sources of pollution. Whilst air pollution was static for a number of years and predicted improvements were not being seen, the trend over the last 5 years from monitoring is showing that air pollution is now improving across the Borough, due to improvements in engine technology. This trend is reported in the Annual Status Reports as part of the Council's statutory air quality management duties. This trend is expected to continue especially with the uptake in electric vehicles.
<ul style="list-style-type: none"> • PM2.5 levels have barely improved in ten years, added with model uncertainty and the failure to include the motorways in the model it could be even worse than presented. 	<ul style="list-style-type: none"> • PM2.5 concentrations have been considered within the assessment due to traffic impacts and compared against the World Health Organization guideline value. Traffic though is not the predominant source of PM2.5 as opposed to NO2 at a local level. PM2.5 concentrations tend to be affected by other sources such as domestic heating and burning, and sources outside the Borough known as transboundary such as industrial pollution as well as natural sources beyond the Council's control and not influenced directly by the contents of the Proposed Submission Version Local Plan. • As part of the study, screening helped demonstrate that the areas around the motorway network, whilst designated as being within an AQMA, are of relatively minor concern considering the few properties near to the motorways. The Motorway AQMAs were therefore excluded from the assessment and are not material to the findings and conclusions of the Assessment.
<ul style="list-style-type: none"> • The Air Quality Report has used modelled address points, rather than at the receptor façade, this could therefore underestimate concentrations 	<ul style="list-style-type: none"> • GIS coordinates are not readily available for the façade but are for the centre of residential addresses. Pollution levels are considered at the facades closest to the sources for the Council's local air quality

Evidence Base - Air Quality Report	
Summary of Issues Raised	Response
at locations in close proximity to the road, and they could potentially underestimate the number of properties exceeding the objective.	management reporting duties. It is acknowledged that pollution levels do drop off rapidly from roadside and to account for modelling uncertainty worse-case model inputs have been used. Results have then been assessed against a risk of exceedance in national limits to further account for any uncertainty and to ensure conclusions are robust based on worse case assumptions.
<i>MP, Local Borough, Town or Parish Councillor</i>	
• None.	•
<i>Landowner/Developer</i>	
• None.	•
<i>Statutory Consultees</i>	
• None.	•
<i>Other</i>	
• None.	•

Evidence Base - Duty to Cooperate	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> I would like transparency on the Council's Duty to Cooperate with neighbouring authorities. Many residents in South Warrington commute to workplaces outside of the town so arguably the housing need could/may be met elsewhere e.g. Cheshire East, Trafford, St Helens, Halton etc. 	<ul style="list-style-type: none"> A full record of the Council's Duty to Cooperate discussions, including those with neighbouring authorities were made available as part of the previous PSVLP Regulation 19 consultation, along with a copy of the Council's draft Statement of Common Ground. The two documents concluded that WBC, along with its neighbouring Authorities, will meet their own housing need within their administrative boundaries. These documents will be updated and published as part of the consultation on the updated Proposed Submission Version Local Plan.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> No comment.
Landowner/Developer	
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> No comment
Statutory Consultees	
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> No comment
Other	
<ul style="list-style-type: none"> The Duty to Co-operate clearly sets out the extent of engagement undertaken by the Council and is deemed to be acceptable. 	<ul style="list-style-type: none"> Comments duly noted.
<ul style="list-style-type: none"> To be effective, the Duty to Cooperate should include consideration of cross boundary issues with neighbouring authorities. This has not happened in the case of Wigan, and the proximity of the Pocket Nook allocation and the Western Gateway Strategic Corridor. 	<ul style="list-style-type: none"> As part of the Duty to Cooperate process, the Council has engaged ongoing and constructively with all its neighbouring authorities. The Pocket Nook allocation in Wigan has not given rise to any strategic cross boundary concerns and is already identified as a broad location for development (Policy SP4) in the adopted Wigan Local Plan Core Strategy (2013).

Evidence Base - Economic Development Needs Assessment (EDNA)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The EDNA overinflates Warrington's employment land requirements. It discounts the jobs forecasts prepared by Oxford Economics and Cambridge Econometrics and instead uses historical past trends, which includes hyper warehousing that super-sized the figures. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its EDNA (2021), including using data which post-dates the EU Brexit referendum, and taking into account the revised Oxford Economics and Cambridge Econometrics forecast for 2021. The Council is therefore confident the amount of land being proposed for employment in the PSVLP (2021), based on past take up rates is robust and the most appropriate method.
<ul style="list-style-type: none"> • EDNA does not consider the economic uncertainty around Brexit and takes a 'policy on' approach. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its EDNA (2021), including using data which post-dates the EU Brexit referendum, and taking into account the revised Oxford Economics and Cambridge Econometrics forecast for 2021. The Council is therefore confident the amount of land being proposed for employment in the PSVLP (2021), based on past take up rates is robust and the most appropriate method to determine the amount of employment land need.
<ul style="list-style-type: none"> • The EDNA makes repeated comments about the demand for sites at the south of Warrington for business development and treats those demands as a need instead of companies shopping around for the best sites or deals they can achieve. 	<ul style="list-style-type: none"> • In line with national policy, the Council's revised EDNA (2021) looks at evidenced market demand/needs and this includes the locational and premises requirements of business needs.
<ul style="list-style-type: none"> • The EDNA adds an extra 14.17ha for employment land lost to new housing and other uses and applies a 5 year buffer, despite brownfield sites being available (e.g. Fiddlers Ferry). 	<ul style="list-style-type: none"> • There is a need to address the loss of 14.17ha of current employment floor space to other uses in the Council's master planning areas, and the updated EDNA (2021) now includes a three year buffer to allow choice and continuation of supply. • Within the revised EDNA (2021) employment land need calculation, the former Fiddlers Ferry Power Station site has now been included and allocated as an employment site in the updated PSVLP (2021).
<ul style="list-style-type: none"> • The EDNA has not taken into account existing available properties to rent. 	<ul style="list-style-type: none"> • Within the Council's EDNA (2021) the local market is assessed through a quantitative review of property enquiries, deals done and the local supply of vacant premises alongside up to date market intelligence derived from consultations with a range of developers, scheme managers and property agents.

Evidence Base - Economic Development Needs Assessment (EDNA)	
Summary of Issues Raised	Response
<i>MP, Local Borough, Town or Parish Councillor</i>	
• None	•
<i>Landowner/Developer</i>	
• None	•
<i>Statutory Consultees</i>	
• None	•
<i>Other</i>	
<ul style="list-style-type: none"> • The economic data sets are confusing and even contradictory as different economic data with updated assumptions will become available over the years. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its EDNA (2021), including using data which post-dates the EU Brexit referendum, and taking into account the revised Oxford Economics and Cambridge Econometrics forecast for 2021. The Council is therefore confident the amount of land being proposed for employment in the PSVLP (2021), based on past take up rates is robust and the most appropriate method to determine the amount of employment land need.

Evidence Base - Health Impact Assessment	
Summary of Issues Raised	Response
<i>Residents</i>	
• None	•
<i>MP, Local Borough, Town or Parish Councillor</i>	
• None	•
<i>Landowner/Developer</i>	
• A separate Health Impact Assessment should be undertaken and not be within the SA.	• The integrated HIA within the SA is considered to be an acceptable approach and no further action is required.
<i>Statutory Consultees</i>	
• None	•
<i>Other</i>	
• None	•

Evidence Base - Infrastructure Delivery Plan (IDP)	
Summary of Issues Raised	Response
<i>Residents</i>	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • IDP proposes a new strategic road south of the Cat & Lion junction, at a cost of £93m. The new road needs to be in place before any development takes place, yet no evidence is presented as to why it is needed, or the source of funding, therefore, the route is not considered to be deliverable. 	<ul style="list-style-type: none"> • The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the updated PSVLP (2021), post the 2019 PSVLP consultation. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the updated PSVLP (2021) is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • A number of proposed works are assigned costs in the IDP, however, some big projects, such as junction improvements to the M62 and M6 do not. Circa 160 infrastructure projects are identified, with a funding gap in excess of £1.54 billion. This raises serious concerns about the delivery of the Local Plan. 	<ul style="list-style-type: none"> • The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the updated PSVLP (2021), post the 2019 PSVLP consultation. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the updated PSVLP (2021) is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.
<i>Statutory Consultees</i>	

Evidence Base - Infrastructure Delivery Plan (IDP)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Highways England: Highways England would expect the transport infrastructure included within the IDP to be based upon accompanying transport evidence. It is considered that there is a need for more certainty over when and who will deliver the required infrastructure to support the Local Plan, and who will be funding it. It would be expected that a base model with committed infrastructure would be included. 	<ul style="list-style-type: none"> • The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the updated PSVLP (2021), post the 2019 PSVLP consultation. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the updated PSVLP (2021) is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.
<p>Other</p> <ul style="list-style-type: none"> • Inconsistencies within the IDP, particularly with regards to costings. 	<ul style="list-style-type: none"> • The Council has updated its Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the updated PSVLP (2021), post the 2019 PSVLP consultation. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the updated PSVLP (2021) is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.

Evidence Base - Warrington Multi Modal Transport Model 2016 (WMMTM) & Supporting Reports	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The modelling has a very narrow focus, assuming an average day in June. This is optimistic. In any event, all scenarios show worse delays caused by the proposed level of development (travel times will be significantly higher on most routes - Tables 15 and 17) even with infrastructure improvements. Confirms that Warrington's road system is already at full capacity and further development will only make matters worse. 	<ul style="list-style-type: none"> Comments noted. However, whilst the modelling outputs show delays to areas of the road network, it does not confirm that Warrington's road system across the whole of the Borough is at capacity. It does, however, serve to highlight where interventions are needed on the network, and this will be in the form of supporting infrastructure.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> The model is unrealistic as it assumes that the swing bridges are continually in place and do not open, and the model makes no allowance for disruptive road works anywhere in the Borough, which is both illogical and unrealistic. 	<ul style="list-style-type: none"> Given the nature and timing of bridge swings and that road works can be unplanned in the event of an emergency, it would not be appropriate for these events to be modelled. Whilst short term disruption may occur from bridge swings and road works, it is considered that these type of short term traffic disruptions are not material to the study findings.
<ul style="list-style-type: none"> Concerns are raised about the robustness of the survey work that underpins the model and the assumptions around how future public transport improvements have been modelled. 	<ul style="list-style-type: none"> The AECOM report "Warrington Transport Model: Model Validation Report, December 2017" presents the work undertaken to calibrate the model and its assessment with how well it performs against observed data. The model has been developed in accordance with guidance provided by the Department for Transport (DfT), known as WebTAG. The model represents morning, evening and inter peak periods and can forecast future year traffic flows on the highway network and passenger numbers on bus and rail networks. It includes a demand model which considers five modes of travel, including all public transport modes.
<ul style="list-style-type: none"> Unclear how the model takes account of a dynamic highway network, no reference to Mersey Gateway crossing, no clarity on how cycling is modelled, how does the model account for delays to buses when bridges are open? 	<ul style="list-style-type: none"> Whilst short term disruption may occur from bridge swings, it is not considered that this type of short term traffic disruption is material to the study findings. The model represents morning, evening and inter peak periods and can forecast future year traffic flows on the highway network and passenger numbers on bus and rail networks. It includes a demand model which considers five modes of travel, including active travel modes.

Evidence Base - Warrington Multi Modal Transport Model 2016 (WMMTM) & Supporting Reports	
Summary of Issues Raised	Response
Landowner/Developer	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Statutory Consultees	
<ul style="list-style-type: none"> • Highways England: The traffic modelling evidence supplied for the consultation is limited in its detail and it is not possible to provide comments on the suitability of the background traffic growth, development trip generation or development trip distribution based upon the information supplied. 	<ul style="list-style-type: none"> • Comments duly noted. However, Highways England have been constructively engaged and on an ongoing basis with regards to the Local Plan through the Duty to Cooperate process and at all the relevant stages of the development of the WMMTM. • At various stages the Local Plan and Transport evidence has been shared with Highways England for comment and agreement. However, post the PSVLP consultation and based on the comments provided from Highways England at the PSVLP (2019) stage, the Council has initiated a further round of meetings and the sharing of existing and new information to satisfy the concerns of Highways England.
<ul style="list-style-type: none"> • We do not consider that the transport evidence provided at this stage is sufficient to support the proposed growth set out within the Draft Local Plan. Further evidence on the development of trip rates and distributions is required for agreement to be reached on their appropriateness. The information supplied does not provide confidence that the modelling includes sufficient levels of traffic growth associated with the Local Plan developments and therefore creates reservations over all of the modelled results presented. 	<ul style="list-style-type: none"> • Comments duly noted. However, Highways England have been constructively engaged and on an ongoing basis with regards to the Local Plan through the Duty to Cooperate process and at all the relevant stages of the development of the WMMTM. • At various stages the Local Plan and Transport evidence has been shared with Highways England for comment and agreement. However, post the PSVLP consultation and based on the comments provided from Highways England at the PSVLP (2019) stage, the Council has initiated a further round of meetings and the sharing of existing and new information to satisfy the concerns of Highways England.
Other	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •

Evidence Base - Brownfield Register	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The Brownfield Register has not been updated since 2017, when it is a requirement it is updated annually. 	<ul style="list-style-type: none"> The information contained in the Brownfield Register is a sub-set of the data contained in the SHLAA. The Brownfield Register has now been updated.
<ul style="list-style-type: none"> There is no full register of Brownfield sites for the area. The Plan is required to make use of all possible brownfield sites prior to building on Green Belt land. The Plan also does not confirm that brownfield will be used prior to Green Belt, this is not the right way to proceed, as further sites will become available through the period of the plan. 	<ul style="list-style-type: none"> The Council produces a Brownfield Register on an annual basis in line with the requirements of the Town and Country Planning (Brownfield Land Register) Regulations 2017. In any event the information contained in the Brownfield Register is a sub-set of the data contained in the SHLAA. Government policy (NPPF - Paragraphs 119 – 123: Making effective use of land) requires local planning authorities to maximise the use of sites within the existing urban area. However, it is not appropriate to insist that all brownfield land is developed before Green Belt can be released. Certain brownfield sites will not be able to come forward until later in the plan period due to the need for infrastructure to be delivered to support their development. The release of some Green Belt land early in the Plan period is necessary in order to help meet the requirement to identify a 5-year deliverable supply of housing land (para 68 of the NPPF).
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Statutory Consultees	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Other	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • There is general concern that the Green Belt Assessment undertaken by ARUP is flawed. Individual site assessments contained in the Green Belt Assessment are considered to be based on unsound evidence and the conclusions are very subjective. 	<ul style="list-style-type: none"> • The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible.
<ul style="list-style-type: none"> • The methodology used in the Green Belt Assessment seems to have taken leaps of faith at certain points to arrive at the conclusion that the Green Belt in south east Warrington performs poorly compared with other areas. • The Council has placed an over-reliance on the October 2016 Arup Report in assessing the Garden Suburb. The report's accuracy and conclusions have been called into question by industry professionals employed by local residents who have raised significant concerns regarding the report. In summary these are: <ul style="list-style-type: none"> ○ it's status and accountability. ○ the insensitive methodology used ○ inconsistent results reported, and ○ an incomplete assessment process. 	<ul style="list-style-type: none"> • The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible. • It should be noted that the amount of Green Belt release proposed south of the Manchester Ship Canal has been significantly reduced in the Updated PSVLP (2021) and that the South East Warrington Urban Extension is significantly smaller than the previous Garden Suburb allocation. • The Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated 'Proposed Submission Version Local Plan'. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries.

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> The Council are satisfied that these reports provide a robust assessment of the performance of Warrington's Green Belt and the implications of releasing the proposed allocation sites.
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> Moore Parish Council (adjoining local authority area) consider that the Green Belt Assessment is deeply flawed and seriously under-values the contribution made by land between Warrington and Runcorn to the purposes of the Green Belt. Its biased methodology undermines the independence of the Assessment and renders the Plan's proposals unjustified and contrary to national policy. Moore Parish Council raises specific concerns regarding how purposes 1, 2 and 4 have been assessed in terms of the contribution they make to the Green Belt, in respect of the Port Warrington and SW Urban Extension proposed allocations. Moore Parish Council consider that the assessment of the SWUE and Port Warrington sites completely ignores Moore Village Conservation Area as part of Purpose 4. 	<ul style="list-style-type: none"> The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible. Moore is a washed over village in the Green Belt and therefore it does not count as a settlement or a town for any of the five purposes. In relation to purpose 4, the approach is clearly explained and justified in the method at paragraphs 110-130 of the 2016 Green Belt Assessment Report. The Conservation Areas in neighbouring authorities have been considered and include Widnes and Runcorn. Paragraph 123 of the 2016 Green Belt Assessment explains why Widnes and Runcorn have been defined as 'historic towns' following a review of the Cheshire Historic Towns Survey (2003). Both of these are also defined as 'towns' for the assessment of purpose 2.
<ul style="list-style-type: none"> Croft and Culcheth Parish Council's consider that it was wrong to take account of the proposed route for HS2 (Phase 2b) when assessing the parcels and individual sites. HS2b is a complex and expensive project which is deeply political and there is still plenty of opportunity for delay, route changes (including deletion of the opposed Golborne spur) or even cancellation. 	<ul style="list-style-type: none"> Initially the HS2 route was not used as a General Area or parcel boundary in the Green Belt Assessment as paragraph 76 of the assessment explains that "only existing boundaries were used. Boundaries relating to proposed development or infrastructure were not used." The exception to this approach would be where the development in question is a committed scheme either in receipt of funding or with an identified safeguarded route. At the time of writing the Green Belt Assessment (January – October 2016), the HS2 route Phase 2b (West Midlands to

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Croft and Culcheth PC's suggest that where two assessments of contribution to Green Belt exist, then the stronger assessment should be used for the purposes of this Plan. 	<p>Leeds and Manchester) which passes through Warrington had not been safeguarded by the Department for Transport (DoT) and therefore the route was not used to define parcel or General Area boundaries. However, the DoT issued a safeguarding direction for the preferred Phase 2b route in November 2016. This means that the preferred route is protected from conflicting development. It is therefore now appropriate to use the proposed HS2 route in defining Green Belt boundaries.</p> <ul style="list-style-type: none"> • The Council disagree with this proposition. The most appropriate assessment to use is the one that conforms with the methodology, in order to maintain consistency in the assessments.
<ul style="list-style-type: none"> • The Parish Council's in south Warrington have collectively raised a number of issues with the methodology used in the Green Belt Assessment and consider that the Plan is sound because of these. The flaws in the methodology are summarised as follows: <ul style="list-style-type: none"> ○ it is over simplistic to parcel and section the Green Belt in the manner utilised. ○ the methodology assumes that sprawl can only relate to the main settlement boundary and does not have regard for inset settlements. ○ a consistent approach has not been applied to the assessment of all of the conservation areas. The historic value of Thelwall, Grappenhall, Stockton Heath, Walton and Moore is heavily dependent on the setting provided by the Green Belt. ○ overall the Green Belt Assessment is weak in providing evidence of sufficient clarity and certainty as to properly assist and justify the tests for excluding parts of the Green Belt from continued protection. There are instances where land within the SWUE and Garden Suburb are performing strongly and yet they are still being proposed for Green Belt release. 	<ul style="list-style-type: none"> • The 2016 Green Belt Assessment and 2017 Green Belt Site Assessments provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible. • The aim of the Green Belt Assessment is to provide an objective, evidence-based and independent assessment of how Warrington's Green Belt contributes to the five purposes of Green Belt set out in national policy, one of which is to preserve the setting and special character of <u>historic towns</u>. • It is not the purpose of the Green Belt Assessment to assess the impact on individual conservation areas. The impact on individual conservation areas, both inside and outside of the borough have been assessed through the Heritage Impact Assessments for the proposed allocation sites, where appropriate.

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The Parish Council's of south Warrington collectively consider that the Green Belt Assessment is biased and provides the Council with the answer that they wanted. 	
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • General support from developer with land holding that is proposed to be allocated. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Arup's original Green Belt Assessment October 2016 identified Green Belt parcels. It did not include the new housing estate at Winwick Park or Hollins Park Hospital in any Green Belt parcel. No reason is given as to why Arup did not include these parts of the Green Belt in their Green Belt Assessment but it is a significant omission. 	<ul style="list-style-type: none"> • The Green Belt Assessment Report (2016) included the new housing estate at Winwick Park and Hollins Park Hospital within Parcel 19 in the General Area Assessment.
<ul style="list-style-type: none"> • A Green Belt boundary that ignores a large housing estate and substantial hospital complex is not robust because every time a planning application is submitted for a residential building or a new hospital building, it could potentially undermine strict Green Belt policies which do not allow such development. The inconsistency created makes it difficult for the Plan to be effective and it therefore fails this test of soundness. 	<ul style="list-style-type: none"> • There has been no material change since the current Plan was adopted 2014.
<ul style="list-style-type: none"> • Several developers and/or landowners, whose sites have not been allocated, object to the conclusions of the Green Belt Assessment in respect of their particular sites (the Omission Sites). • Several developers consider that the methodology adopted for assessing the Green Belt sites is flawed; has not been applied consistently and relies too much on professional judgement and therefore it is not clear how the overall conclusions of the assessment have been reached. 	<ul style="list-style-type: none"> • The 2016 Green Belt Assessment and 2017 Green Belt Site Assessments provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible.
<ul style="list-style-type: none"> • The Green Belt Assessment fails to consider whether villages lying in the Green Belt should continue to be "washed over" or whether there is scope for the settlement to be inset. Provides example of Runnymede BC Assessment. 	<ul style="list-style-type: none"> • Green Belt Village Reviews adopt a different methodology compared to Green Belt Assessments which consider the five purposes of Green Belt (paragraph 134) due to the different policy requirements of paragraph 140 of the NPPF. A Green Belt Village Review would provide

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
	<p>recommendations as to whether a village should remain within the Green Belt or could be excluded from the Green Belt based on paragraph 140 of the NPPF. A recommendation for removal from the Green Belt would not imply that the village would be suitable for development given that Policy DEV1 of the Updated Proposed Submission Version Local Plan (2021) sets out the Council's proposed distribution of housing. If the Council took forward a recommendation to remove a village from the Green Belt it would still need to demonstrate exceptional circumstances in accordance with paragraph 136 NPPF.</p>
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
<i>Other</i>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •

Evidence Base - Habitat Regulations Assessment (HRA)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • Croft & Culcheth Parish Council's consider that the treatment of Manchester Mosses SAC (Risley and Holcroft Mosses) has been superficial and the large-scale urbanisation proposed in the Plan would have a significant and unpredictable impact that has simply been ignored. The Environmental Assessment of the mosses has been superficial and does not include the significant effects from increased traffic and associated emissions that would result from the Plan. 	<ul style="list-style-type: none"> • The Habitats Regulations Assessment (HRA) of the Warrington Draft Local Plan (PSVLP) identified potential effects in relation to air quality impacts on Manchester Mosses SAC, which has been recognised by Natural England (NE). The Council has undertaken additional work in consultation with NE to clarify the scale of the air quality impacts and their potential effects. An amended HRA (Updated HRA dated July 2021) has been produced that addresses this issue. The updated HRA concludes that the the Warrington Local Plan would have no adverse effect on the integrity of the Manchester Mosses SAC but considers that some measures to reduce the (small) contribution of Warrington to the overall subtle effect is required for purposes of good stewardship and to reinforce the conclusion of no adverse effect on integrity. It recommends a three-tier approach to achieving positive air quality for Warrington and the Manchester Mosses SAC that requires modifications to the main development area policies (MD1 to MD6); the outlying settlement policies which line the M62 corridor (OS1, OS2 and OS6) to require a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles to be provided and to the air quality section (Part 4) of Environmental & Amenity Policy ENV8 (and the associated supporting text at paragraph 9.8.6) to require all other development that would result in increased traffic flows on the M62 above specific levels to also provide a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles. The specified allocation policies have been modification in the Updated PSVLP in accordance with the recommendations in the Updated HRA.

Evidence Base - Habitat Regulations Assessment (HRA)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Croft & Culcheth Parish Council's consider that the Plan should consider restoration and re-wetting of existing mosses, former moss land and re-creation elsewhere. There have been large-scale and effective re-creation of mossland elsewhere in England. The Great Fen Project will create a huge wetland area for the benefit both of wildlife and of people. They would like Warrington to show similar ambition. 	<ul style="list-style-type: none"> • Policy DC3 identifies the Greater Manchester Wetlands Nature Improvement Area (NIA) in the east of the borough. This is a joint designation that extends across parts of the adjoining boroughs of Salford, Trafford and Wigan. The vision for the NIA is for it to become an exemplar of biodiversity restoration, enhancement and the delivery of a landscape-scale ecological wetland network for wildlife and people. The policy commits the Council to working with Partners to strengthen and expand the NIA, along with other significant Green Infrastructure assets, both within and outside of the borough.
Landowner/Developer	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Statutory Consultees	
<ul style="list-style-type: none"> • Natural England (NE) consider that the Habitats Regulations Assessment (HRA) of Warrington Local Plan has identified potential effects in relation to air quality impacts on Manchester Mosses Special Areas of Conservation (SAC). NE advise that further detail is needed to clarify the scale of impacts and certainty that mitigation measures are deliverable and will remove impacts. Without the assurance of suitable mitigation measures, the allocations are at risk of becoming undeliverable at project stage if the Habitats Regulations cannot be satisfied. 	<ul style="list-style-type: none"> • The Council has undertaken additional work in consultation with NE to clarify the scale of the air quality impacts and their potential effects. An amended HRA (Updated HRA dated July 2021) has been produced that addresses this issue. The Updated HRA concludes that the the Warrington Local Plan would have no adverse effect on the integrity of the Manchester Mosses SAC but considers that some measures to reduce the (small) contribution of Warrington to the overall subtle effect is required for purposes of good stewardship and to reinforce the conclusion of no adverse effect on integrity. It recommends a three-tier approach to achieving positive air quality for Warrington and the Manchester Mosses SAC that requires modifications to the main development area policies (MD1 to MD6); the outlying settlement policies which line the M62 corridor (OS1, OS2 and OS6) to require a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles to be provided and to the air quality section (Part 4) of Environmental & Amenity Policy ENV8 (and the associated supporting text at paragraph 9.8.6) to require all other development that would result in increased traffic flows on the

Evidence Base - Habitat Regulations Assessment (HRA)	
Summary of Issues Raised	Response
	M62 above specific levels to also provide a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles. The specified allocation policies have been modification in the Updated PSVLP in accordance with the recommendations in the Updated HRA.
<ul style="list-style-type: none"> Natural England consider that the Warrington Local Plan HRA does not assess the potential impacts on Functionally Linked Land (FLL) within the Warrington Waterfront allocation (Policy MD1 – Waterfront) with regards to the Mersey Estuary Special Protection Area (SPA)/Ramsar. Natural England advise that this issue requires careful consideration in the HRA. 	<ul style="list-style-type: none"> The Council has undertaken additional work in consultation with NE to assess the potential impacts on FLL within all of the main development areas (Policies MD1 to MD6) and the smaller outlying settlement allocations (OS1 to OS6) in respect of the Mersey Estuary SPA/Ramsar. An amended HRA (Updated HRA dated July 2021) has been produced that addresses this issue. The Updated HRA recommends that Policies MD1 to MD3 should include text to reflect the need for a project stage HRA due to the potential of FLL and the possible need for mitigation for SPA birds. These policies have been modification in the Updated PSVLP in accordance with the recommendations in the Updated HRA.
Other	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">

Evidence Base - Site Assessments	
Summary of Issues Raised	Response
Residents	
• None.	•
MP, Local Borough, Town or Parish Councillor	
• None.	•
Landowner/Developer	
<ul style="list-style-type: none"> • SLG object to their site at Reddish Crescent (Ref: 1565, R18/014 and R18/P2/118) not being allocated and provide a comparison of the site in respect of the proposed allocated sites in Lymm, which can be summarised as follows: <ul style="list-style-type: none"> ○ the sequential test for flood risk has not been applied to sites in Lymm. ○ there is an error in the GB Assessment conclusion. The site should not have been assessed as being Strongly performing. ○ the highway conclusions are not correct. There would be no need to make use of third party land and in any event there is another access point off Whitefield Grove. 	<ul style="list-style-type: none"> • The 2016 Green Belt Assessment and 2017 Green Belt Site Assessments provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible. • The methodology for assessing sites was developed by independent consultant's following a review of national guidance and best practice. The assessment approach focused on using a sequential approach with sites prioritised for assessment based on Local Plan spatial priorities and Green Belt Assessment outcomes. Applying a sequential approach to the assessment of sites through the use of major constraints, such as lower performing Green Belt sites as a means of sifting sites is considered to be consistent with national policy. • The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan's objectives and SA/SEA site assessment criteria to establish that the suitability of sites. These criteria included performance against Flood Risk. The Updated PSVLP (2021) has taken account of the revised EA Flood Risk Mapping that was issued in April 2021.
<ul style="list-style-type: none"> • Redrow Homes object to a number of the conclusions in the Site Assessment Proforma in respect of their site in Lymm, which can be summarised as follows: 	<ul style="list-style-type: none"> • The methodology for assessing sites was developed by independent consultant's following a review of national guidance and best practice. The assessment approach focused on using a sequential approach with

Evidence Base - Site Assessments	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> ○ the agricultural land quality. ○ the proximity of mineral reserves. ○ the level of contamination. ○ the impact on landscape character, and ○ the impact on biodiversity. 	<p>sites prioritised for assessment based on Local Plan spatial priorities and Green Belt Assessment outcomes. Applying a sequential approach to the assessment of sites through the use of major constraints, such as lower performing Green Belt sites as a means of sifting sites is considered to be consistent with national policy.</p> <ul style="list-style-type: none"> ● The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan’s objectives and SA/SEA site assessment criteria to establish that the suitability of sites.
<ul style="list-style-type: none"> ● Rowland Homes object to their site at Waterworks Lane (Ref: 3334, R18/P2/061 and R18/P2/092) not being allocated and provide a comparison of the site in relation of the proposed allocated sites in Winwick, which can be summarised as follows: <ul style="list-style-type: none"> ○ the site encroaches less into open countryside. ○ the site is better related to existing development. ○ the site has stronger boundaries. The durability of the northern boundary of allocated site is weak as it has no hedgerow. ○ the allocated site is in close proximity to a Registered Historic Battlefield. ○ the site capacity of Rowland Homes site could be reduced to 130 dwellings. ○ the pylons crossing the allocated site and contaminated land in the NE corner would reduce the sites capacity significantly. Hence, the minimum policy requirement of 130 dwellings would not be achievable. ○ The allocated site will have a greater impact on the Landscape Character if the area. 	<ul style="list-style-type: none"> ● The methodology for assessing sites was developed by independent consultant’s following a review of national guidance and best practice. The assessment approach focused on using a sequential approach with sites prioritised for assessment based on Local Plan spatial priorities and Green Belt Assessment outcomes. Applying a sequential approach to the assessment of sites through the use of major constraints, such as lower performing Green Belt sites as a means of sifting sites is considered to be consistent with national policy. ● The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan’s objectives and SA/SEA site assessment criteria to establish that the suitability of sites.
Statutory Consultees	
<ul style="list-style-type: none"> ● None. 	<ul style="list-style-type: none"> ●
Other (0):	

Evidence Base - Site Assessments	
Summary of Issues Raised	Response
<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">•

Evidence Base - Site Selection Methodology	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • Croft and Culcheth Parish Council's object to the site selection methodology because of its impact on the best and most versatile agricultueal (BVAL) land for the following reasons: <ul style="list-style-type: none"> ○ The Plan claims that the 'value of agricultural land was a consideration in the options assessment and sustainability appraisal process'. However, it is not clear how this affected or changed any of the assessments, if at all. Almost all the land proposed for removal from the Green Belt for housing and employment use also results in a loss of the BVAL, which will become more important following Brexit with the need for the UK to produce more of its own food. ○ The loss of a significant amount of the BVAL should be set against the 'exceptional circumstances' that the Council claims for its release. ○ There is concern about farms size as holdings are split into smaller units. This will reduce farming income and viability and increase pressure for development of the remainder. 	<ul style="list-style-type: none"> • The quality of agricultural land was taken into account in the Council's spatial option and site assessment processes and in the Plan's Sustainability Appraisal. The Council has sought to minimise the loss of the best and most versatile agricultural land. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan's objectives and SA/SEA site assessment criteria to establish that the sites were 'suitable'. The agricultural quality of the land was just one the the criteria that were used to assess the sites. Since the majority of the borough is covered by similar quality agricultural land this has little impact on the overall assessment of sites. The amount of land to be removed from the Green Belt (and hence the amount of BMVAL to be lost) has significantly reduced in the Updated PSVLP (2021) compared to previous PSVLP (2019). It is now only proposed to remove 5% of land from the Green Belt compared to 11% previously. The vast amount of agricultural land in the borough will be retained.
Landowner/Developer	
<ul style="list-style-type: none"> • A few developers disagree with the approach of automatically discounting sites which are deemed to make a strong contribution to the Green Belt from the site appraisal process in considering potential allocations. It is considered that Green Belt harm needs to be given the appropriate level of weight alongside wider sustainability considerations in selecting sites for release. • It is considered that this approach does not reflect that the overall sustainability of a site and runs contrary to the guidance in paragraph 138 of the NPPF (now paragraph 142). 	<ul style="list-style-type: none"> • The methodology for assessing sites was developed by independent consultant's following a review of national guidance and best practice. The assessment approach focused on using a sequential approach with sites prioritised for assessment based on Local Plan spatial priorities and Green Belt assessment outcomes. Applying a sequential approach to the assessment of sites through the use of major constraints, such as lower performing Green Belt sites as a means of sifting sites is considered to be consistent with national policy.

Evidence Base - Site Selection Methodology	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> It is considered that the spatial options assessment process is consistent with paragraph 138 of the NPPF (now paragraph 142 in the Updated NPPF 2021) as it gave consideration to land which has been previously-developed and/or is well-served by public transport in the first instance.
Statutory Consultees	
<ul style="list-style-type: none"> Sport England request that when decisions are made about which locations will be brought forward and their potential dwelling capacity, that consideration be given to whether any of the sites contain existing sports facilities such as playing fields which justify protection under Sport England's Playing Fields Policy, the Council's Playing Pitch Assessment and Strategy and paragraphs 96 and 97 of the NPPF (now paragraphs 98 and 99 in the updated NPPF 2021). If they do, then development in these locations should account for the need to maintain such facilities and site policies should require the facilities to be protected or replaced. 	<ul style="list-style-type: none"> The Council's site selection methodology has taken account of existing POS and playing pitch provision in it's assessment process.
Other	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">

Evidence Base - Sustainability Appraisal (SA)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The SA does not inform the reader what is being tested and some of the findings are dubious, especially in relation to the Green Belt. 	<ul style="list-style-type: none"> • As required by legislation, the SA appraises the draft Plan and reasonable alternatives. An Updated (Pre-submission) SA (2021) has been undertaken on the Updated PSVLP (2021). Section 4 of the SA Report sets out an explanation for all the alternatives that have been tested with regards to the spatial strategy (including an explanation of the the evolution of the spatial options). This is supported by an appraisal of employment options at Section 5, site specific options at Section 6 and a consideration of the options of the Garden Suburb options at Section 8. Section 9 sets out an appraisal of the draft Plan (the Updated PSVLP); explaining that this relates to the policies considered individually and as a whole. The methods used to determine effects are described. • In terms of the adequacy of the findings the SA does not assess the Green Belt. In order to assist in amending detailed Green Belt boundaries a comprehensive Green Belt Assessment has been undertaken, which is supported by a separate report that considers the potential implications of releasing the ‘selected sites’ from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundary. This report ensures that the relevant considerations have been properly documented assisting in demonstrating a sound and robust evidence base.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> • Croft and Culcheth Parish Council’s consider that the SA acknowledges that climate change and resource use are issues but downplays or ignores the Climate Change Crisis – which the draft plan would make worse. The SA sets objectives relating to climate change, energy efficiency, and production of renewable energy but only evaluates them superficially. Greater consideration is required to be given to climate change, degradation of habitats and the public health challenge arising from lack of active travel. 	<ul style="list-style-type: none"> • The Council do not consider that the SA downplays the Plans impacts with regard to climate change. The SA considers climate change issues through a range of SA Objectives, including a specific Climate Change Objective. The SA also acknowledges negative effects with regards to a range of environmental factors (in particular, it predicts significant negative effects on soil resources and acknowledges that this is an important issue) but it also takes account of the positive measures that are proposed and the context that environmental net gain will need to be

Evidence Base - Sustainability Appraisal (SA)	
Summary of Issues Raised	Response
	<p>achieved. The conclusions acknowledge that the Plan effects are positive, as they go beyond the current policy context. This remains a valid conclusion. It is also acknowledged that the Plan is not going to have significant positive effects.</p>
<ul style="list-style-type: none"> It is now Government policy to cut greenhouse gases to zero by 2050. Croft and Culcheth Parish Council's consider that the plan, which is intended to last until 2037 (most of the way to 2050), takes no account of this new initiative which will clearly need much stronger local plan policies. 	<ul style="list-style-type: none"> The role of the SA is to influence the decision making process. However, the extent to which climate change targets and actions are included within the Local Plan is not solely reliant upon the SA. The Local Plan is not the only mechanism for addressing the government's climate change targets.
Landowner/Developer	
<ul style="list-style-type: none"> There is no evidence within the 2019 Sustainability Appraisal (SA) to justify the selection of 10% incremental growth within the Outlying Settlements as the most sustainable option, with insufficient testing of reasonable alternatives to that growth undertaken throughout the preparation of the PSLP. As a result, the Council has failed to correctly identify the reasonable alternatives for growth and therefore the sustainability benefits and impacts from growth in the Outlying Settlements and, as a result of the absence of any SA work, has failed to identify the negative impacts associated with the proposed strategy which is to constrain growth in the Outlying Settlements. The Council has provided unsound reasons for the selection/rejection of reasonable alternatives (and specifically spatial option F3 – High growth and increased dispersal to the outlying settlements) within the 2019 SA (Peel Holdings Ltd). 	<p>Insufficient justification that 10% growth in the outer urban settlements is the most sustainable approach (in light of alternatives)</p> <ul style="list-style-type: none"> It is important to note that the NPPF does not specify that the <u>most sustainable</u> approach must be taken (however this may be defined). The justification for selecting the preferred spatial strategy is provided in both the SA Report and within other Local Plan evidence papers (notably the 'Development Options and Site Assessment Technical Report'). An SA Report must only present 'outline reasons' as to why a preferred approach has been selected in light of alternatives. With regards to the levels of growth in the outer settlements, outline reasons for the proposed approach are provided in Sections 4.3 to 4.5 of the Updated SA Report (2021). There is reference to the discounted alternatives and why they are not considered as appropriate. The same process was also undertaken at issues and options stage, with findings set out within an Interim SA Report (2017). In respect of the previous PSVLP (2019) a total of 18 high level options were tested throughout the SA process. Nine options were tested at Issues and options stage and nine at preferred options stage. In terms of the Updated PSVLP (2021) a total of 12 high level options have been tested. At both stages of plan making, different levels of growth in

Evidence Base - Sustainability Appraisal (SA)	
Summary of Issues Raised	Response
	<p>relation to the outer settlements were considered in the SA. As can be seen in Section 4 of the SA Report, differing levels of growth were presumed for the outer settlements, depending upon the focus of the option and overall level of growth involved. The following specific numbers were tested at the second Regulation 19 (see Section 4.5 of Updated SA Report, 2021) with regards to growth at the outer settlements:</p> <ul style="list-style-type: none"> ○ 1,100 dwellings (under options D2, E2, F2 and G2) ○ 2,444 dwellings (under option D3) ○ 2,500 dwellings (under option G3) ○ 3,500 dwellings (Under option E3) ○ 4,200 dwellings (Under option F3) <ul style="list-style-type: none"> ● Therefore, the implications of a suitable range of growth scenarios in the outer settlements have been considered in the SA; and the findings have helped to shape the preferred strategy. ● There are countless permutations of growth options that could be tested, and therefore it is reasonable for Local Authorities to set some parameters as to what constitutes a reasonable approach. Significant work was undertaken by the Council to identify what a proportionate amount of growth would be for the outer settlements and therefore the 10% target is not simply ‘plucked from thin air’. The higher levels of growth tested in the outer settlements represent opportunities for ‘more than incremental growth’ and/or sustainable urban expansions to certain settlements. These options were tested to the same degree of detail as the preferred approach of incremental growth.
<ul style="list-style-type: none"> ● A range of options have been considered for the expansion of the main urban area. No similar exercise has been undertaken for the smaller settlements. This is an omission from the plan and goes to the adequacy of the plan strategy and how that has evolved being informed by SA of reasonable alternatives. Sites within or adjacent to the smaller 	<p>The appraisal of a dispersed approach is flawed as it is not based upon an understanding of site development locations</p> <ul style="list-style-type: none"> ● The appraisals at the outer settlements (and the urban areas) were undertaken with an understanding of the potential development sites that could be involved. A ‘pool’ of reasonable site options was

Evidence Base - Sustainability Appraisal (SA)	
Summary of Issues Raised	Response
<p>settlements were assessed and sieved, prior to SA testing, on the basis of the Green Belt Assessment, undertaken previously, which is flawed and makes erroneous conclusions about site locations and impacts (Brenrun Ltd, Satnam and Brooklyn Ltd).</p>	<p>shortlisted and appraised in the SA on a site specific level to provide a 'bottom-up' understanding of potential impacts (see Section 6 of the Updated SA Report).</p> <ul style="list-style-type: none"> • The strategic appraisals made use of this information at each of the settlements to understand the broad constraints and opportunities associated with growth in each of the outer settlements. The findings in the options appraisal demonstrate this by referring to the potential and likely effects that could occur given a settlement's characteristics and having an understanding of which sites could come forward in that area. • At an incremental level of growth, the choice between sites and the lower level of growth means that the more sensitive areas could be more easily avoided when compared to the greater dispersal approach. It is reasonable to conclude that negative effects with regards to landscape, heritage and biodiversity are more likely to occur for the increased dispersal options compared to incremental growth. • Whilst it is still the case that the exact effects of development would depend on the exact combination of sites that are involved at each settlement, it is possible to conclude on what the effects are likely to be at different scales of growth (on the basis of the characteristics of the wider pool of sites). • The SA states which of the outer settlements are likely to be more sensitive, and that greater issues are more likely to occur with increased dispersal (given the need for development on a greater number of these sites and / or urban extensions. These conclusions remain valid. • It is acknowledged that different settlements in the outer areas have different sensitivities, but each has been considered when undertaking assessments of the overall effects in relation to the spatial options. • There are tens if not hundreds of options that could be tested in relation to the amount of growth that should be divided between the different outer settlements. It would not be proportionate to undertake such

Evidence Base - Sustainability Appraisal (SA)	
Summary of Issues Raised	Response
	<p>assessments in the SA, nor is it necessary given that the options appraisals identify the overall effects that are likely to occur at the outer settlements at a strategic level. It is also important to remember that site assessments were undertaken to provide a more location specific consideration of sustainability issues and this helped to determine the implications of development too.</p>
<ul style="list-style-type: none"> Options for growth which do not include the Garden Suburb were not tested. As such, since a “reasonable alternative” is without doubt a range of options alternative to the Garden Suburb, the SA has failed to address reasonable alternatives (Satnam and Brooklyn Ltd). 	<ul style="list-style-type: none"> The high level options did not specify that a garden suburb would be involved for each of the options. Therefore, at this scale of assessment, such approaches identified the broad impacts that could occur as a result of development on urban fringe sites in the Green Belt. For the detailed spatial options, several distributions were tested that would deliver the identified housing target (at two different scales of growth). A dispersed option was tested that does not include a Garden Suburb at all, whilst the other options involved different scales of expansion in this area in combination with more or less dispersal of growth around the urban area. The reasons for establishing the alternatives are set out in the Updated SA Report at Section 4.
<ul style="list-style-type: none"> The SA refers to a binary choice of brownfield land within the urban area or green belt release. There is a whole range of open space sites within the urban area which have not, as a result, been assessed (Satnam and Brooklyn Ltd). 	<ul style="list-style-type: none"> The Council’s Strategic Housing Land Availability Assessment (SHLAA) (latest version 2020) considered a range of sites within the urban area, including employment sites; under-utilised areas of open space (whether formally designated as such or not) and vacant unused land whether PDL or greenfield.
<ul style="list-style-type: none"> The testing of the options has not extended to air quality and traffic impacts in the centre of Warrington arising from the various options, as this has yet to be adequately modelled and tested (Satnam). 	<ul style="list-style-type: none"> The SA undertakes a proportionate high level appraisal to the assessment of air quality and traffic. This is undertaken at various stages including the high level options, site specific appraisals and draft plan appraisal. In fact, the options appraisal process raises the potential air quality issues associated with an approach that focuses entirely or heavily upon the Warrington urban area. Detailed air quality and traffic modelling is a separate piece of evidence that is rarely undertaken through the SA process alone.

Evidence Base - Sustainability Appraisal (SA)	
Summary of Issues Raised	Response
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> No mitigation and enhancement measures are proposed for the air quality and accessibility topics based on the findings of the appraisal. Highways England consider the proposed monitoring measures for these two topic areas to be appropriate to understand the impact of the Local Plan. Overall, Highways England consider that an appropriately detailed SA has been carried out for this stage in the plan making process. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> Historic England consider that as drafted, the heritage and site allocation policies do not represent having a positive effect on the SA Theme: built and natural heritage. However, the suggested changes would help achieve this. 	<ul style="list-style-type: none"> The heritage and site allocation policies have been amended in line with the suggestions made by Historic England.
<i>Other</i>	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">

Evidence Base - Urban Capacity Assessment	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • There are a number of issues with the SHLAA and the data contained within it, which can be summarised as follows: <ul style="list-style-type: none"> ○ the NPPF requires an annual review of land availability. The SHLAA is out of date. ○ the NPPG requires the basis for the land availability assessment to be revisited if there is a housing shortfall (ie. the large number of sites less than 0.25ha have not been explicitly assessed. ○ the period used in the SHLAA (ie. 15 years) is inconsistent with the Plan period, this mis-match exaggerates the shortfall, since in practice more brownfield sites would come forward over 20 years. ○ 12% of large sites were identified as suitable but not currently available and have been discounted. ○ the Year 2007/8 has not been taken into account when evaluating small sites windfall (Table 2.4). ○ large windfall sites have not been taken into account. ○ when deciding on Green Belt release a cautious approach should not be adopted, a best estimate approach is more appropriate (Table 3.8 of the SHLAA suggest that the on average the actual number of completions is 17% higher). ○ the small sites allowance should be adjusted upwards to 440, using the average of 88 dpa (Table 2.4 of SHLAA). • When all of these issues are taken into account the available supply from urban area/brownfield sites is considered to be between 13,578 and 14,393. 	<ul style="list-style-type: none"> • The Council has undertaken additional master planning work in the town centre and surrounding area to confirm the housing land capacity and this has now incorporated into the latest SHLAA (2020). • It should be noted that the SHLAA <u>is</u> reviewed and updated annually and that it is only one part of the land availability assessment and trajectory that supports the Plan. The Housing Trajectory that supports the Updated PSVLP provides a comprehensive assessment of the borough's housing land supply for the full Plan Period. • The planning practice guidance (Paragraph: 017 Reference ID: 3-017-20190722) makes it clear that the assessment of sites needs to consider "the <u>suitability, availability and achievability</u> of sites, including whether the site is economically viable". The Council's analysis demonstrates that windfall sites are comprised almost exclusively from small sites (ie. Less than 0.25ha), hence there is no justification for including a windfall allowance for large sites (Refer to SHLAA 2020, paragraph 2.60). The Council are satisfied that the Housing Trajectory provides a robust assessment of the boroughs available land supply, including non Green Belt sites.
<ul style="list-style-type: none"> • The latest TC Masterplan indicates 8,000 homes will be delivered. The UCA indicates 6,549 homes. 1,500 homes have been lost. Where is the supporting evidence (Appendices 1 and 2). The additional 1,816 homes 	<ul style="list-style-type: none"> • The latest figure, based on the data from the 2020 SHLAA, indicates an available supply from the the urban area/brownfield sites of 11,785 dwellings. • The TC Masterplan (2020) sets out the Council's ambitions for the Town Centre up to 2040. Hence, it is looking over a longer time period than the PSVLP.

Evidence Base - Urban Capacity Assessment	
Summary of Issues Raised	Response
identified beyond the Plan period should be brought forward, rather than sacrificing Green Belt.	
<ul style="list-style-type: none"> The <i>Additional Supply (wider urban area) to 2037</i> is identified as 210 dwellings but is not evidenced. Assuming that this covers the 5 years from the end of the SHLAA this equates to 42 dpa, which seems very low. 	<ul style="list-style-type: none"> This is only the longer term supply for last five years of the Plan period that is projected to be delivered from those sites outside of the Town Centre Masterplanning areas but within the main urban area of Warrington. This figure is identified as coming from the Peel Hall allocation.
<ul style="list-style-type: none"> Using a "best estimate" from the SHLAA; a more realistic small sites allowance and bringing forward housing in the TC Masterplan yields a total of 17,460 homes, which far exceeds the 20 year need (15,384). 	<ul style="list-style-type: none"> The Council consider that it's Housing Trajectory provides a robust assessment of the available housing land supply.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> There is general support from developers to deliver residential development within and around Warrington town centre. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> The residential-led town centre regeneration initiatives should be driven by the Council and its partners irrespective of the overall housing requirement and the claimed yields from this source should not be at the expense of sites that are known to be deliverable and attractive to the housing market. 	<ul style="list-style-type: none"> The Council are satisfied that their approach to assessment of urban capacity is robust. It is not consistent with the NPPF to just release sites from the Green Belt that are attractive to the market without seeking to maximise use of brownfield land. This approach would lead to unnecessary release of Green Belt land.
<ul style="list-style-type: none"> At the very least, contingency measures should be in place to monitor the delivery of market and affordable housing in and around the town centre in order that additional land can be made available early in the plan period should it become apparent that an insufficient pipeline of viable new developments are coming forward in these areas. 	<ul style="list-style-type: none"> The housing supply is and will continue to be monitored through the SHLAA annual review process. Part 8 of Policy DEV1 of the Updated PSVLP (2021) provides a trigger for a review of the Plan should monitoring indicate that a 5-year deliverable and/or subsequent developable supply of housing land over the Plan Period can no longer be sustained.
<ul style="list-style-type: none"> A more robust (and evidence led) approach however would be to ensure that a sufficient quantum of deliverable sites are identified now as Housing Allocations within the WLP. 	<ul style="list-style-type: none"> The Council's approach to identifying a sufficient quantity of deliverable sites is robust and evidence led and has identified and allocated sufficient sites.

Evidence Base - Urban Capacity Assessment	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The availability and deliverability of the overall housing land supply in the Plan period has been over estimated. 	
<ul style="list-style-type: none"> • Developers have raised significant concerns about the approach used to calculate the urban capacity and deliverability of the proposed 13,726 dwellings in the urban area during the plan period. In respect of the <u>Town Centre Masterplanning</u> these concerns can be summarised as follows: <ul style="list-style-type: none"> ○ There are extensive areas subject to various land ownerships with a large number of them still being in active use. It is unclear how these sites will be delivered, other than through the use of CPO powers. ○ A number of sites identified as deliverable by the Council have been assessed within the Viability Report as unviable (ie. a number of parcels within the Waterfront and Inner City sites Waterfront Parcels 2 - 4 (250 units in each parcel), which in turn raises significant concerns over the ability of these sites to contribute to affordable housing provision and other infrastructure required through Policy INF5 and the IDP. ○ There are known infrastructure deficits in respect of the Town Centre and Masterplan Areas, which will take time to deliver. Over 66% of the TC and Waterfront capacity (4,363 of 6,549 dwellings) is expected to come forward within the first 10 years of the plan period, which seems unrealistic, given the ownership, land use and infrastructure constraints, as well as other difficulties and delays associated with urban regeneration schemes (contamination etc). ○ Within the Town Centre and Waterfront, this assumes that land for over 3,630 new dwellings (over 24% of the planned total) which has not currently been put forward for residential development will become available during the plan period, 	<ul style="list-style-type: none"> • The Council has undertaken additional master planning work in the town centre and surrounding area to confirm the housing land capacity and this has now incorporated into the latest SHLAA (2020). • It should be noted that the SHLAA is reviewed and updated annually and that it is only one part of the land availability assessment and trajectory that supports the Plan. The Housing Trajectory that supports the Updated PSVLP provides a comprehensive assessment of the borough's housing land supply for the full Plan Period.

Evidence Base - Urban Capacity Assessment	
Summary of Issues Raised	Response
<p>based solely on an allocation in the plan. This represents a significant risk to the deliverability of the Plan. It is hugely optimistic considering the large number of ownerships and the fact that several sites are already occupied with alternative uses, whilst others will only be unlocked through significant infrastructure investment.</p> <ul style="list-style-type: none"> ○ a claimed capacity of 6,549 homes is identified within the Town Centre and Waterfront. Developer assessment identifies the developable and deliverable capacity of 4,187 homes (1,765 homes within the TC and 2,422 homes at the Waterfront) (i.e. 2,360 less than claimed). 	
<ul style="list-style-type: none"> ● Developers have raised significant concerns about the approach used to calculate the urban capacity and deliverability of the proposed 13,726 dwellings in the urban area during the plan period. In respect of the <u>SHLAA</u> these concerns can be summarised as follows: <ul style="list-style-type: none"> ○ The Lead-in-time assumptions are too short. ○ The Small Sites Allowance includes some double counting as sites within the first three years will have already been delivered. ○ the Small Site Allowance includes some double counting as opportunities for small sites coming forward will be greatly reduced in the last 5 years of the plan period given the comprehensive masterplanning and regeneration of urban 	<ul style="list-style-type: none"> ● To ensure that the SHLAA assessments are accurate and the resultant findings are robust, the Council invited stakeholders, developers and landowners to comment upon assumptions relating to lead-in-times (and build rates/densities etc) as part of stakeholder events in August 2014; July 2015 and again as part of the Council's Local Plan Review - Preferred Development Option (PDO) consultation in July/August 2017. The assumptions are also sensitivity tested through the analysis of a sample of individual applications from major and local developers each year to ensure that they remain accurate. Where developers and landowners have provided specific information relating to these matters and other influences such as phasing, this has been used to inform the development forecast for those particular sites. ● Any small sites that are delivered are recorded in the completions for a particular year. The Small Sites Allowance is the forward supply for subsequent future years. ● The analysis of past trends in the SHLAA does not show any signs of a reduction in the availability of small sites coming forward. Therefore, the Council are confident that the trend will continue for the full plan period.

Evidence Base - Urban Capacity Assessment	
Summary of Issues Raised	Response
<p>areas planned for the first 15 years, which will clearly use up the vast majority of the urban land supply, and therefore such windfall is highly unlikely to continue at past rates. Considered that there will not be any significant windfall after 2033 and as such the supply should be reduced (ie. 304 less homes).</p> <ul style="list-style-type: none"> ○ The inclusion of large sites without planning permission within the deliverable supply is questioned. There is an element of risk with the deliverability of these sites. To temper the risk associated with this element of the supply there should be a 25% reduction to sites, which reduces this element of the supply to 3,388 (i.e. 1,130 less than claimed). 	<ul style="list-style-type: none"> ● The vast majority of the deliverable supply consists of sites that have planning consent in line with the definition in NPPF. Large sites without planning permission have only been included in the deliverable supply in specific cases where the Council is certain that housing completions will begin within five years. Examples of such cases are where grant funding is dependant upon commencement/completion within specified time frames and where the Council or one of its partners own the site and are in control of its delivery.
<ul style="list-style-type: none"> ● In the absence of a reasonable buffer within the urban capacity supply, it is our Client's position that a discount should be applied to this source of supply based on evidence of delivery and/or evidence of past non-implementation. ● The certainty of delivery must underpin the strategy for the delivery of housing to meet identified needs across Warrington as a whole. ● It is considered that there is a deficit of 2,000-3,000 homes in the housing land supply. 	<ul style="list-style-type: none"> ● The Council has undertaken additional master planning work in the town centre and surrounding area since the PSVLP (2019) consultation to confirm the housing land capacity and this has now been incorporated into the latest SHLAA (2020). ● It should be noted that the SHLAA is reviewed and updated annually and that it is only one part of the land availability assessment and trajectory that supports the Plan. The Housing Trajectory that supports the Updated PSVLP (2021) provides a comprehensive assessment of the borough's housing land supply for the full Plan Period.
<ul style="list-style-type: none"> ● There appears to be a disconnect between the quantum of residential development proposed in the Town Centre and Waterfront Areas and the associated viability considerations in respect of the infrastructure needed to support that level of development. At this stage it is quite clear that this quantum of sites cannot be considered 'developable' as 	<ul style="list-style-type: none"> ● The Council has undertaken additional master planning work in the town centre and surrounding area since the PSVLP (2019) consultation to confirm the housing land capacity and this has now been incorporated into the latest SHLAA (2020).

Evidence Base - Urban Capacity Assessment	
Summary of Issues Raised	Response
<p>there is not a 'reasonable prospect' that these sites 'could be viably developed at the point envisaged' and so on that basis an alternative housing strategy must be adopted in order that the Plan can be found to be sound.</p> <ul style="list-style-type: none"> • A discount of 2,626 dwellings should be applied to the Town centre/waterfront source of housing land supply and new sites should be identified for housing development to make up this shortfall. In this case it would need to be additional sites released from the Green Belt. 	<ul style="list-style-type: none"> • It should be noted that the SHLAA <u>is</u> reviewed and updated annually and that it is only one part of the land availability assessment and trajectory that supports the Plan. The Housing Trajectory that supports the Updated PSVLP (2021) provides a comprehensive assessment of the borough's housing land supply for the full Plan Period. • The available supply for the town centre (including the Waterfront) has been comprehensively reviewed since the previous Regulation 19 consultation. As part of this work the residential capacity of the Waterfront allocation has been reduced from 2,000 to around 1,335 new homes in the Updated PSVLP (2021). • The Updated Proposed Submission Version Local Plan (2021) proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan. There is no requirement for additional sites to be released from the Green Belt.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Housing need is calculated from 2017, which results in an over estimation of the housing need. The Standard Method calculates the average annual housing need using the 10- year projection of growth divided by 10. This is inappropriate method since the annual rate of household increase in Warrington is predicted to halve (1% to 0.5%) over the next 20 years. 	<ul style="list-style-type: none"> The Council acknowledges that Warrington’s minimum housing need figure under the Government’s Standard Housing Methodology and associated Planning Practice Guidance should be re-calculated with the ‘current year’ being 2021. The Updated Proposed Submission Version Local Plan (2021) proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government’s methodology.
<ul style="list-style-type: none"> The method of predicting the economically driven housing requirement is questionable. The inherent uncertainty associated with trend-based predictions (OE forecasts changed from 921 to 635 jobs per year, a variation 286). Given the uncertainty it is unclear why the less optimistic CE forecast data has been discarded. The approach taken to account for local factors lacks transparency and robustness. 	<ul style="list-style-type: none"> The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council’s economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816, in line with the minimum housing need figure under the Government’s standard housing methodology, will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.
<ul style="list-style-type: none"> The new standard method for calculation of housing need has been ignored in favour of a method that provides a higher number. It is considered that this contravenes the NPPF (Par 60). <ul style="list-style-type: none"> There are no exceptional circumstances that justify any alternative approach. The alternative approach taken is directly at odds with the latest demographic trends and market signals. 	<ul style="list-style-type: none"> The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council’s economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816, in line with the minimum housing need figure under the Government’s standard housing methodology, will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.
<ul style="list-style-type: none"> Given the significantly downward trajectory of population growth and employment projections from reputable sources such as Oxford 	<ul style="list-style-type: none"> The Plan period is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption. It is

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
<p>Economics and Cambridge Econometrics it would make sense to reduce the plan to the minimum required (ie. 15 years). This would also make sense to allow the effects of Brexit to become apparent and for new sources of brownfield land such as Fiddler's Ferry Power Station to become available. This would enable the growth to be managed in an incremental way that minimises loss of green space and maximises sustainable development in the right locations. Therefore a total housing need of (860 hpa x 15yr) 12,900 would be a deliverable plan that would mean that the Green Belt is protected and development can be targeted in the right areas.</p>	<p>anticipated the Local Plan will be adopted in 2023 and therefore the Plan needs to extend to 2038. The Council has however re-based the updated Proposed Submission Version Local Plan with a start date of 2021. This results in a total Plan Period of 18 years.</p>
<ul style="list-style-type: none"> Concern with the selection of vested interests that have been employed to produce the evidence base for WBC. GL Hearn, have produced the housing needs calculation that supports Green Belt release and at the same time they also represent owners of Green Belt land who are putting forward that land for development, a direct conflict of interest. 	<ul style="list-style-type: none"> GL Hearn are respected consultants and have extensive experience, they are in this instance representing the Council and have confirmed that they have no conflict of interest.
MP, Local Borough, Town or Parish Councillor	
<ul style="list-style-type: none"> The LHNA seeks to establish justification for housing need based on aspirational growth rather than a realistic projection of historic trends. 	<ul style="list-style-type: none"> The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816, in line with the minimum housing need figure under the Government's standard housing methodology, will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.
Landowner/Developer	
<ul style="list-style-type: none"> Given that the Local Housing Need was first calculated in March 2019 rather than back in 2017, we would infer that for the purposes of plan making, the 'current year' in accordance with the methodology set out in 	<ul style="list-style-type: none"> The Council acknowledges that Warrington's minimum housing need figure under the Government's Standard Housing Methodology and

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
NPPG means 2019. This results in a LHN of 860 dpa rather than the 909 dpa the Council has calculated using a 'current year' of 2017.	associated Planning Practice Guidance should be re-calculated with the 'current year' being 2021.
<ul style="list-style-type: none"> • A view presented is that Warrington is a self-contained Housing Market Area rather than forming part of the Mid-Mersey Housing Market Area. Warrington's migration flows display a high level of self- containment whilst contextual house prices show a closer relationship with the Cheshire Authorities, which together with Warrington form the LEP area. 	<ul style="list-style-type: none"> • The Council has reviewed the evidence in respect of the Mid-Mersey Housing Market Area in its updated LHNA, including data on house prices and migration patterns. The Council is confident that Warrington still forms part of this housing market area.
<ul style="list-style-type: none"> • There is disagreement with some elements of the affordable housing calculations adopted by GL Hearn in Warrington and this may significantly underplay the true affordable housing need in the Borough. • It is proposed that the LHNA should incorporate analysis of the Housing Register; there should be no net off 90% of all owner occupiers from the backlog; disagreement on the with lower percentage of need from newly forming households adopted and consideration should be given for the impact of the right to buy. 	<ul style="list-style-type: none"> • In updating the LHNA, GL Hearn have followed the established method and definition as set out in the NPPF and associated Planning Practice Guidance. This includes adopting both the methodology and key data sources recommended. As such the Council is confident that the LHNA gives an accurate assessment of the need for affordable housing. • Analysis has been undertaken to estimate the need for affordable housing in the 2021-38 period (inclusive). The analysis is split between a need for social/affordable rented accommodation and the need for affordable home ownership (AHO). The latter includes housing for those who can afford to rent privately but cannot afford to buy a home. • The analysis has taken account of local housing costs (to both buy and rent) along with estimates of household income. Additionally, when looking at rented needs, consideration is given to estimates of the supply of social/affordable rented housing. For Affordable Homes Ownership, consideration is given to the potential supply of resales of low-cost home ownership properties (such as shared ownership).
<ul style="list-style-type: none"> • It is unclear whether the data used is the most up to date and local to Warrington. 	<ul style="list-style-type: none"> • In updated the LHNA, GL Hearn have used the most up to date data available for for Warrington.
<ul style="list-style-type: none"> • The Local Housing Needs Assessment rightly notes that the NPPF amendments to the affordable housing definition are not comprehensive, providing little guidance on how to assess the 	<ul style="list-style-type: none"> • Comment noted

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
quantitative need for those innovative tenures now recognised in the NPPF as meeting a wider range of needs.	
<ul style="list-style-type: none"> That the Assessment notes the difficulties of those households with an income that may allow them to buy but who may be unable to as a result of lack of savings for a deposit, is positive, as is the suggestion that the Council may wish to seek a supply of housing on which upfront capital payment is provided. 	<ul style="list-style-type: none"> Comment noted
<ul style="list-style-type: none"> Support for the Rentplus model to buy housing and that the 10% grant at purchase should not be protected in perpetuity this should only be applied to public funding. This model allows those in an affordable tenure already to move on with rent to buy. 	<ul style="list-style-type: none"> The guidance in the NPPF states that where public funding is provided to support other routes to affordable housing including rent to buy then there should be provisions for homes to remain at an affordable price for future households, or for any receipt to be recycled for alternative affordable housing provision or refunded to the government or relevant authority specified in a funding agreement. The draft Plan in seeking to maintaining affordable housing in perpetuity recognises a 'staircasing' approach which allows occupiers to own a greater proportion of their home – will be supported where the value from the value from the sale is re-invested in affordable housing in Warrington.
<ul style="list-style-type: none"> The statement in the Needs Assessment that shared ownership housing is likely to be the most appropriate option is not supported, as this fails to recognise the distinct benefits that rent to buy offers to those aspiring to purchase, and the problems of saving for and accessing a deposit that many still face when looking at shared ownership options. 	<ul style="list-style-type: none"> The Updated PSVLP ensure that provision in made for 'First Homes' in accordance with Government requirements. The support text to DEV2 confirms that the Council's preference for the remainder of low cost housing is shared ownership, or similar products such as rent to buy.
Statutory Consultees	
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none">
Other	
<ul style="list-style-type: none"> The growth predictions are unsound coming from the Local Enterprise Partnership and there is no sound evidence to back up the predictions. The use of older 2014 economic/house projection data and a formula recommended by the Government is only loosely justified so there's not 	<ul style="list-style-type: none"> The previous Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
<p>enough confidence in the accompanying evidence base concerning the Council's housing forecast.</p>	<p>update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816, in line with the minimum housing need figure under the Government's standard housing methodology, will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.</p>

Evidence Base - Local Plan Viability Assessment	
Summary of Issues Raised	Response
<i>Residents</i>	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
<i>MP, Local Borough, Town or Parish Councillor</i>	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • A number of developers promoting sites within proposed Local Plan allocations have raised concerns with the methodology, inputs and market evidence used to prepare the Local Plan viability assessment. Of these, some developers have requested that the Council takes further advice in order to revise and supplement its evidence base, ensuring that that policy and infrastructure costs applied are realistic, deliverable, and evidenced in accordance with the Framework and Practice Guidance. 	<ul style="list-style-type: none"> • The Council has undertaken the preparation of a full revised Local Plan Viability Assessment (2021). As part of this work the Council has consulted on the revised inputs for the assessment with all developers promoting sites within proposed Local Plan allocations. The Council has also reviewed all infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The revised Local Plan Viability Assessment and updated Infrastructure Delivery Plan (2021) will be published ahead of the consultation on the Updated Proposed Submission Version Local Plan (2021).
<ul style="list-style-type: none"> • A number of developers have raised a concern over what is considered to be a lack of transparency in s106 costs. It is pointed out that no breakdown of costs included within the S106 allowance sites is provided in the Viability Assessment. Developers are of the view that the Council's evidence needs to demonstrate, in a transparent way, how all of the policy requirements within the draft plan have been factored into the Assessment on an item by item basis, including relevant infrastructure requirements. 	<ul style="list-style-type: none"> • A full schedule of all S106 and infrastructure requirements is included in the updated Local Plan Viability Assessment and the updated Infrastructure Delivery Plan.
<ul style="list-style-type: none"> • Other developers request that the Council acknowledges the impact on viability of smaller schemes that S106 contributions can have and requests sufficient flexibility within the Submission Version policies to allow for a 'relaxation' of policy requirements in the event that an evidential impact on the viability of developments can be demonstrated by the Applicant. 	<ul style="list-style-type: none"> • Policy INF5 in the updated Proposed Submission Version Local Plan has been amended to ensure sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought.

Evidence Base - Local Plan Viability Assessment	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> One developers considers that the Study raises concerns that a number of the sites are unviable, particularly as part of the Town Centre regeneration schemes, including the Waterfront. They consider that this raises significant concerns over the deliverability and viability of a number of these sites, and whether all affordable housing contributions (20%) can be delivered on-site. They are also unclear as to whether all the abnormalities (as required through the IDP) have been fully taken into account. As such, coupled with concerns regarding the viability of the IDP, significant concerns are raised in relation to the deliverability of a number of the Council's sites. 	<ul style="list-style-type: none"> Having undertaken the revised Local Plan Viability Assessment, the Council is confident that the Plan as a whole and individual development proposals within the Plan are viable. It is accepted that certain sites, in particular higher density sites within the town centre, are not viable in the baseline appraisals. However, the sensitivity analysis shows that it is realistic that these sites will be capable of being delivered over the Plan period. The Council is confident the market for town centre, higher density residential development will mature over the plan period, with subsequent increases in sales values. To ensure that the Plan does not render development unviable, the updated PSVLP includes an amendment to Policy INF5 to ensure sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought.
Statutory Consultees	
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none">
Other	
<ul style="list-style-type: none"> Warrington & Halton Green Party do not believe the funding package to deliver the aspirations is achievable. While some money is available from Government for infrastructure, the bulk of the funding will need to come from the developers. The size of that funding requirement is unclear in the Plan as is the commitment of developers to deliver the necessary funding for infrastructure. 	<ul style="list-style-type: none"> Having undertaken the revised Local Plan Viability Assessment, the Council is confident that the Plan as a whole and individual development proposals within the Plan are viable. As part of this work the Council has reviewed the Plan's infrastructure requirements and costs. Having undertaken this work the Council is confident that the necessary infrastructure is capable of being delivered. The revised Local Plan Viability Assessment (2021) and updated Infrastructure Delivery Plan (2021) will be published ahead of the consultation on the Updated Proposed Submission Version Local Plan (2021).