

Warrington Local Plan Examination

ID02

Matters, Issues and Questions identified by the Inspectors

Matter 1 – Procedural/legal requirements

Issue

Whether the Council has complied with relevant procedural and legal requirements.

Questions

Plan preparation and scope

1. Has the preparation of the Local Plan been in accordance with the Local Development Scheme in terms of its form, scope and timing?
2. Have requirements been met in terms of the preparation of the Local Plan, notification, consultation and publication and submission of documents?
3. Has the preparation of the Local Plan complied with the Statement of Community Involvement?
4. How does the Local Plan relate to the Appleton Parish Thorn Ward Neighbourhood Development Plan and how would it be affected by the adoption of the Local Plan?
5. What existing and proposed Supplementary Planning Documents (SPD) are there? What is the intended relationship of SPDs with specific policies in the Local Plan and what purpose will they serve? Is this clear and appropriate?
6. What is the intended status of the Illustrative Development Concept drawings and Illustrative Concept Plans for the Main Development Areas?
7. What is the intended role of Development Frameworks for Main Development Areas? How will the Local Plan relate to these and masterplans?

Sustainability Appraisal

N.B. The merits of potential options for the scale and distribution of growth are dealt with under later matters

8. How has the Sustainability Appraisal (SA) informed the preparation of the Local Plan at each stage and how has it been recorded/reported?
9. How and when were options considered for:
 - a) The overall scale of housing and other growth
 - b) The broad distribution of development across the Borough
 - c) Potential Main Development Areas and site allocations
 - d) Policy approaches
10. Has the methodology for the SA been appropriate?

Habitats Regulations Assessment

11. How was the Habitats Regulations Assessment (HRA) for the Local Plan carried out and reported?
12. Was the methodology used thorough and appropriate noting concerns raised by Natural England, particularly around the justifications used for screening out impacts, the assessment of impacts associated with mineral extraction and the assessment of air quality impacts?
13. Has an appropriate level of assessment of the in-combination effects of the allocations and infrastructure proposed, particularly in the South of the Borough, been undertaken?
14. What is the current position regarding the suggested update to the HRA to address concerns expressed by Natural England regarding the potential impact of the Local Plan on Holcroft Moss within the Manchester Mosses Special Area of Conservation?

Other matters

15. Does the Local Plan include policies in relation to the mitigation of and adaptation to climate change? If so, which?
16. Has the Council had regard to the other relevant specific matters set out in S19 of the 2004 Act (as amended) and Regulation 10?
17. How have issues of equality been addressed in the Local Plan?

Matter 2 – The duty to co-operate

Issue

Whether the Council has complied with the duty to co-operate in the preparation of the Local Plan.

N.B. the duty to co-operate concerns the preparation of the Local Plan as far as it related to strategic matters. This covers the period up to, but not after the submission of the Local Plan and strategic matters are defined in S33A (4) of the Planning and Compulsory Purchase Act 2004. Issues of soundness are dealt with under other matters.

Questions

Housing needs, the housing requirement and overall housing provision

1. Who has the Council engaged with in terms of housing needs, the housing requirement and housing provision and what form has this taken?
2. What are the inter-relationships with other authorities in terms of migration, commuting, housing markets and service provision?
3. How have the issues of housing needs, the housing requirement and overall housing provision been addressed through co-operation? What are the specific outcomes for example in terms of statements of common ground?
4. What is the position of other authorities in terms of the approach to identifying and meeting housing needs? Have specific concerns been raised through duty to co-operate discussions or representations?
5. Are there any issues of unmet need to be addressed?

Economic growth/employment land provision

6. What are the cross-boundary issues relating to economic growth and employment land provision?
7. Who has the Council engaged with? When did this engagement take place and what form did it take?
8. What is the outcome of this engagement?
9. Specifically, how has the Council co-operated with St Helens Borough Council regarding the apportionment of the employment land at the Omega extension and what is the result of that co-operation?
10. What is the position of other authorities in terms of the Council's approach to these issues? What specific concerns were raised through duty to co-operate discussions or representations on the Local Plan?

Strategic housing and employment sites

11. What cross boundary issues are there in relation to the Main Development Areas and how have these been dealt with through co-operation?
12. Are there cross boundary issues that arise from strategic allocations or planning permissions in neighbouring authorities and if so, how have these been dealt with through co-operation?

Other strategic matters

13. Taking each of the following in turn, what cross boundary issues are there and how have they been addressed through co-operation?
 - a) Green Belt alteration (within Warrington and elsewhere)
 - b) Transport infrastructure and mitigation
 - c) Other infrastructure needs
 - d) Ecological/biodiversity issues
 - e) Green infrastructure
 - f) Gypsy and Traveller needs
 - g) Minerals
 - h) Waste

Overall

14. In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

Matter 3 – The Spatial Strategy

Issue

Whether the Spatial Strategy is justified, effective and consistent with national policy, including in terms of the distribution of development across the Borough, site selection, the overall approach to the Green Belt and the overall approaches to infrastructure provision and viability.

N.B. Detailed issues relating to the overall need/requirement for housing and employment land are dealt with under Matters 3 and 4, detailed issues relating to the Main Development Areas and site allocations are dealt with under Matters 6 and 7, detailed issues relating to housing land supply are dealt with under Matter 8 and issues relating to the strategic approach to retail, leisure and the Town Centre are dealt with under Matter 10

Questions

Housing

Overall Spatial Strategy for housing

1. Is the strategy to maximise the development potential of the existing urban area for new housing appropriate and justified?
2. Is the Council's assessment of urban capacity for the plan period (11,785 homes) realistic and justified by evidence? Has the development potential of the existing urban area been maximised, for example in terms of specific identified sites, an allowance for smaller sites and optimising densities?
3. On a strategic, Borough wide level, does the scale of housing growth required, the capacity of the existing urban area and the inability of neighbouring authorities to accommodate any of Warrington's housing needs provide the exceptional circumstances to justify altering the Green Belt in principle?
4. What is the basis for a flexibility allowance of 10% in terms of the housing requirement? Is this justified?
5. What is the basis for the removal of land from the Green Belt to accommodate at least 4,821 homes in the plan period (see Policy DEV1) given the figure of 4,372 in Table 1 of the Local Plan, particularly as 10% flexibility has already been factored in?
6. In terms of high level options for Green Belt release, what is the basis for the chosen approach i.e. the majority of Green Belt release adjacent to the main urban area with incremental growth in outlying settlements? Why was this chosen ahead of other options? Is this justified?
7. What is the basis for the overall split of housing allocations and Green Belt release between land adjacent to the main urban area (at least 4,020 homes in Policy DEV1) and outlying settlements (at least 801 homes in Policy DEV1)? Is this justified?

Outlying settlements

8. How were the site allocations in the outlying settlements selected, what factors were used to assess potential sites and what criteria were used?

9. What evidence fed into this process e.g. Green Belt Assessment, flood risk data etc?
10. How has the process been recorded and documented? What role did the SA have?
11. Which options were considered, why were alternative options discounted and why were the site allocations chosen?
12. Was the methodology applied to site selection appropriate and were the conclusions of the process justified?
13. Is the scale of housing growth in each of the outlying settlements justified?

Adjacent to the main urban area

14. How were the Main Development Areas adjacent to the main urban area involving Green Belt release (SE Warrington Urban Extension, Fiddlers Ferry and Thelwall Heys) selected, what factors were used to assess potential options and what criteria were used?
15. What evidence fed into this process e.g. Green Belt Assessment etc?
16. How has the process been recorded and documented? What role did the SA have?
17. Which options were considered, why were alternative options discounted and why were the Main Development Areas (involving Green Belt release) chosen?
18. Was the methodology applied appropriate and were the conclusions of the process justified?

Employment land

19. What is the basis for the calculation of the existing supply of employment land within the Borough? What was included and excluded? Is the approach robust and justified?
20. Is it justified to include 31.80ha from the Omega Extension in St Helens in the supply for Warrington? Should a greater area be included given that consent has now been granted for 75ha?
21. On a strategic, Borough wide level, does the scale of employment land required and the existing supply (within Warrington and at the Omega Extension in St Helens) provide the exceptional circumstances to justify altering the Green Belt in principle?
22. How were the Main Development Areas for employment (SE Warrington Employment Area and Fiddlers Ferry) selected, what factors were used to assess potential options and what criteria were used?
23. What evidence fed into this process e.g. Economic Development Needs Assessment, Green Belt Assessment etc?
24. How has the process been recorded and documented? What role did the SA have?
25. Which options were considered, why were alternative options discounted and why were the Main Development Areas for employment chosen?
26. Was the methodology applied appropriate and were the conclusions of the process justified?

The Green Belt

27. Should the Local Plan identify safeguarded land? If so, where and for what purpose?
28. What is the basis for the inset settlements (excluded from the Green Belt) and Green Belt settlements (washed over)? Is the list of settlements in each category justified in each case?
29. In other respects, is the approach in Policy GB1 justified, effective and consistent with national policy? Are any main modifications necessary for soundness?

The overall approach to infrastructure

30. What are the overall infrastructure requirements as a result of the proposals in the Local Plan? How have these been established and in particular how has the Council worked with other organisations?
31. What role does the Infrastructure Development Plan have and how does it relate to the Local Plan? How will the Infrastructure Development Plan evolve over time?
32. Is there a distinction between infrastructure which is essential for the proposed development to take place and desirable infrastructure?
33. How have costs for infrastructure been established? What are the sources of funding and is this sufficiently clear? Where there is a significant funding gap, how will this be met, is this clear and is it realistic?
34. In overall terms, is it sufficiently clear that essential infrastructure will be provided and delivered at the right time?

Viability

N.B. specific issues relating to the viability of individual Main Development Areas and site allocations are dealt with under Matters 6 and 7

35. Is the methodology used for the Viability Assessment of the Local Plan appropriate and robust?
36. Does it provide a realistic and comprehensive assessment of revenue and costs for the Main Development Areas and site allocations over the plan period?
37. Are all costs included and are the estimates of these justified? How have infrastructure requirements been factored in and how do these correspond to the Infrastructure Development Plan and costs identified in that?
38. What is the basis for the assumptions regarding the phasing of development and the timing of the need for and costs of infrastructure and are these realistic and justified?
39. How do the assumptions on housing delivery compare with the housing trajectory?

Matter 4 – Housing need and the housing requirement

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to housing need and the housing requirement.

Questions

1. Has the calculation of Local Housing Need (816 homes per annum) been undertaken appropriately using the standard method and correct inputs?
2. Should the housing need figure be higher than the minimum Local Housing Need figure of 816 homes per annum? Do any of the circumstances set out in paragraph 10 of the housing and economic needs assessment chapter of the PPG (or any other relevant circumstances) apply in Warrington?
3. The Local Housing Needs Assessment Update 2021 concludes that 816 homes per annum will provide an increase in working age population sufficient to support the number of additional jobs likely to be created over the plan period. Are the assumptions and calculations which support this analysis robust and is the conclusion justified?
4. What is the relationship, if any, between the housing need figure of 816 homes per annum and the amount of employment being provided for i.e. approx. 316ha?
5. What are the implications of this amount of employment land in terms of jobs growth? Is it possible/reasonable to estimate the number of jobs likely to be created from this amount of employment land using past trends, evidence from recent proposed and permitted schemes in Warrington and the wider region or analysis in the Economic Development Needs Assessment 2021 (noting that it estimates the amount of land needed for projected jobs growth using both Oxford Economics and Cambridge Econometrics models)?
6. Does the scale of employment land provision justify an increase in the housing need figure?
7. Notwithstanding the above, is the housing requirement of 816 homes per annum justified? Should it be higher or lower than this and if so to what level and on what basis?
8. What is the basis for the stepped housing requirement (678 homes per annum rising to 870 per annum from 2026)? Why were the particular time periods and annual averages chosen? Is the approach justified?
9. Should the Local Plan set housing requirements for designated neighbourhood areas in light of paragraph 66 of the NPPF?

Matter 5 – Economic growth and development

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to economic growth and development.

Relevant policy DEV4

Questions

1. Is the Economic Development Needs Assessment 2021 justified in basing the need for employment land on historic take up rates rather than jobs growth forecasts?
2. What effect has the development of the Omega site had on past take up rates and is it justified to assume such take up rates will continue over the plan period?
3. Will the supply of employment land from site allocations and planning permissions in neighbouring authorities and the wider area affect demand for employment land in Warrington?
4. What is the basis for including a three year buffer and is this justified?
5. What is the basis for including the allowance for business displacement and is this justified?
6. Is it reasonable to rely on two substantial allocations to meet most employment needs?
7. What evidence is there to suggest that the Town Centre can viably act as the main location for new Class E Office development, noting that the Economic Development Needs Assessment 2021 identifies that demand is mostly focused on Birchwood rather than the Town Centre, as well as the competition from the adjacent cities of Liverpool and Manchester/Salford?
8. Will the lack of explicit support in the Local Plan for the University and higher education more generally, impact on the ability of the Council to achieve the Local Plan's vision and objectives?
9. Is the approach to existing employment areas and development within them effective and justified?
10. In other respects, is Policy DEV4 justified, effective and consistent with national policy?
11. Are any main modifications to Policy DEV4 necessary for soundness?

Matter 6a – Main Development Area: Warrington Waterfront

Issue

Whether the Warrington Waterfront Main Development Area (Policy MD1) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

1. What is the background to the Main Development Area and how was it identified?
2. What is the basis for the scale of development proposed and is this justified?
3. What is the background to the specific policy requirements (set out at Policy MD1.3)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
4. What is the status of the Town Centre Masterplan Character Area documents in relation to this allocation?
5. Does the policy identify all appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
6. Have the funding and programme for the Warrington Western Link been confirmed? On this basis, is it reasonable to anticipate the first homes to be completed in 2027/28?
7. Are there any environmental or other site constraints, including flood risk, that will inhibit the development of the allocation as envisaged?
8. Should the production of a Development Framework for the entire site (referred to at Policy MD1.2 point 4) be required prior to planning permission being granted?
9. What would be the effect of removing the area of land from the Green Belt adjacent to the proposed Western Link? Are there exceptional circumstances to alter the Green Belt in this particular case?
10. Have the potential impacts on Local Wildlife Sites, and also downstream designated sites, been recognised and how will they be adequately addressed?
11. Does the Policy adequately provide for the assessment of in-combination impacts on important ecological features that may arise as a result of this and other allocations within the Local Plan and also the Warrington Western Link?
12. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
13. Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?

Examination of the Warrington Local Plan

14. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
15. What is the expected timescale and rate of development and is this realistic?
16. Are any main modifications necessary for soundness?

Matter 6b – Main Development Area: South East Warrington Urban Extension

Issue

Whether the South East Warrington Urban Extension Main Development Area (Policy MD2) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

1. What is the background to the Main Development Area and how was it identified?
2. What is the basis for the scale of development proposed and is this justified?
3. What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
4. What would be the effect of developing the site on the purposes of the Green Belt?
5. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
6. What is the approach towards Green Belt compensatory improvements? Is this sufficiently clear?
7. What is the background to the specific policy requirements in Policy MD2.3? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
8. Does Policy MD2 identify all appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
9. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
10. Is the development proposed viable and deliverable as anticipated within the plan period? What is the situation in relation to land ownership and developer interest?
11. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
12. Are any main modifications necessary for soundness?

Matter 6c – Main Development Area: Fiddlers Ferry

Issue

Whether the Fiddlers Ferry Main Development Area (Policy MD3) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

1. What is the background to the Main Development Area and how was it identified?
2. What is the basis for the scale of development proposed and is this justified?
3. Has the development potential of the brownfield part of the site been optimised?
4. What is the background to the specific policy requirements (set out at MD3.3)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
5. What is the status of the development concept diagram associated with this allocation? How will this support the preparation of a Development Framework (MD3.2 point 5)?
6. Does the policy identify all appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
7. Are there any contamination or other constraints either on or adjacent to the site, including the need for remediation and flood risk matters, that will inhibit the development of the allocation as envisaged?
8. Will there be appropriate opportunities to promote sustainable transport modes, and that safe and suitable access can be achieved for all users?
9. What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
10. What would be the effect of developing the site on the purposes of the Green Belt, noting particularly the proximity of the urban area of Widnes at this point and the role of Green Belt in preventing neighbouring towns from merging into one another?
11. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
12. Have the potential impacts on European designated sites been adequately assessed? What are the implications for the scale of development envisaged?
13. Have the potential impacts on Local Wildlife Sites been recognised and could they be adequately addressed?
14. Does the policy adequately provide for the assessment of in-combination impacts on important ecological features that may arise as a result of this and other allocations within the Local Plan?

15. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
16. Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
17. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that all infrastructure requirements are provided?
18. What is the expected timescale and rate of development and is this realistic?
19. Are any main modifications necessary for soundness?

Matter 6d – Main Development Area: Peel Hall

Issue

Whether the Peel Hall Main Development Area (Policy MD4) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

1. What is the background to the Main Development Area and how was it identified?
2. What is the basis for the scale of development proposed and is this justified?
3. What is the status of the site in terms of planning applications/permissions and how does this relate to the proposal and policy requirements in the Local Plan?
4. What is the background to the specific policy requirements in Policy MD4.3? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
5. Does Policy MD4 identify all appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
6. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
7. Is the development proposed viable and deliverable as anticipated within the plan period? What is the situation in relation to land ownership and developer interest?
8. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
9. Are any main modifications necessary for soundness?

Matter 6e – Main Development Area: Thelwall Heys

Issue

Whether the Thelwall Heys Main Development Area (Policy MD5) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

1. What is the background to the Main Development Area and how was it identified?
2. What is the basis for the scale of development proposed and is this justified?
3. What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
4. What would be the effect of developing the site on the purposes of the Green Belt?
5. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
6. What is the approach towards Green Belt compensatory improvements? Is this sufficiently clear?
7. What is the background to the specific policy requirements in Policy MD5? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
8. Does Policy MD5 identify all appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
9. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
10. Is the development proposed viable and deliverable as anticipated within the plan period? What is the situation in relation to land ownership and developer interest?
11. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
12. Are any main modifications necessary for soundness?

Matter 6f – Main Development Area: South East Warrington Employment Area

Issue

Whether the South East Warrington Employment Area Main Development Area (Policy MD6) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

1. What is the background to the site allocation and how was it identified?
2. What is the basis for the scale of development proposed and is this justified?
3. What is the status of the site in terms of planning applications/permissions and how does this relate to the proposal and policy requirements in the Local Plan?
4. What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
5. What would be the effect of developing the site on the purposes of the Green Belt?
6. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
7. What is the approach towards Green Belt compensatory improvements? Is this sufficiently clear?
8. What is the basis for the scale and types of uses envisaged? Should Policy MD6 be clearer as to the mix and scale of different uses?
9. What are the implications in terms of employment land/floorspace provision and overall jobs growth? How would this contribute to employment land requirements/jobs growth outside of the Borough and what cross boundary issues does this raise? How have such issues been addressed?
10. What is the background to the specific policy requirements in Policy MD6? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
11. Does Policy MD6 identify all appropriate and necessary highways and other infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
12. Have environmental impacts, including air quality matters and landscape and visual effects, been adequately considered and addressed?
13. Does the Policy adequately provide for the assessment of in-combination impacts on important ecological features that may arise as a result of this and other allocations within the Local Plan?

14. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
15. Is the development proposed viable and deliverable as anticipated within the plan period? What is the situation in relation to land ownership and developer interest?
16. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
17. Are any main modifications necessary for soundness?

Matter 7a – Site allocation – Croft

Issue

Whether the site allocation at Croft (Policy OS1) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

1. What is the background to the site allocation and how was it identified?
2. What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
3. What would be the effect of developing the site on the purposes of the Green Belt?
4. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
5. What is the basis for the scale of development proposed and is this justified?
6. What is the background to the specific requirements of Policy OS1? Are they justified and consistent with national policy? Does this provide clear and effective guidance on constraints and suitable mitigation?
7. Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
8. Is the requirement for Green Belt compensatory improvements justified and appropriate?
9. Is the Council satisfied that safe access to the site can be secured, and that Croft has the appropriate transport infrastructure required to support the development?
10. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
11. Is the development proposed viable and deliverable within the period envisaged, noting that it is anticipated that first homes would be completed in 2024/5?
12. What is the situation in relation to land ownership and developer interest?
13. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
14. Are any main modifications necessary for soundness?

Matter 7b– Site allocation – Culcheth

Issue

Whether the site allocation at Culcheth (Policy OS2) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

- 1) What is the background to the site allocation and how was it identified?
- 2) What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
- 3) What would be the effect of developing the site on the purposes of the Green Belt?
- 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
- 5) What is the basis for the scale of development proposed and is this justified?
- 6) What is the background to the specific requirements of Policy OS2? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
- 8) Is the requirement for Green Belt compensatory improvements justified and appropriate?
- 9) Is the Council satisfied that safe access to the site can be secured, and that Culcheth has the appropriate transport infrastructure required to support the development?
- 10) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
- 11) Is the development proposed viable and deliverable within the period envisaged, noting that it is anticipated that first homes would be completed in 2024/5?
- 12) What is the situation in relation to land ownership and developer interest?
- 13) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
- 14) Are any main modifications necessary for soundness?

Matter 7c – Site allocation – Hollins Green

Issue

Whether the site allocation at Hollins Green (Policy OS3) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

- 1) What is the background to the site allocation and how was it identified?
- 2) What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
- 3) What would be the effect of developing the site on the purposes of the Green Belt?
- 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
- 5) What is the basis for the scale of development proposed and is this justified?
- 6) What is the background to the specific requirements of Policy OS3? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
- 8) Is the requirement for Green Belt compensatory improvements justified and appropriate?
- 9) Is the Council satisfied that safe access to the site can be secured, and that Hollins Green has the appropriate transport infrastructure required to support the development?
- 10) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
- 11) Is the development proposed viable and deliverable within the period envisaged, noting that it is anticipated that first homes would be completed in 2024/5?
- 12) What is the situation in relation to land ownership and developer interest?
- 13) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
- 14) Are any main modifications necessary for soundness?

Matter 7d – Site allocations – Lymm

Issue

Whether the site allocations at Lymm (Policies OS4 and OS5) are justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

Taking each of the following site allocations individually in turn:

- Policy OS4 – Pool Lane/Warrington Road
- Policy OS5 – Rushgreen Road

1. What is the background to the site allocation and how was it identified?
2. What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
3. What would be the effect of developing the site on the purposes of the Green Belt?
4. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
5. What is the basis for the scale of development proposed and is this justified?
6. What is the background to the specific requirements of the policy? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
7. Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
8. Is the requirement for Green Belt compensatory improvements justified and appropriate?
9. Is the Council satisfied that safe access to the site can be secured, and that Lymm has the appropriate transport infrastructure required to support the development?
10. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
11. Is the development proposed viable and deliverable within the period envisaged, noting that it is anticipated that first homes would be completed in 2024/5?
12. What is the situation in relation to land ownership and developer interest?
13. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
14. Are any main modifications necessary for soundness?

Matter 7e – Site allocation – Winwick

Issue

Whether the site allocation at Winwick (Policy OS6) is justified, effective and consistent with national policy.

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

1. What is the background to the site allocation and how was it identified?
2. What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
3. What would be the effect of developing the site on the purposes of the Green Belt?
4. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
5. What is the basis for the scale of development proposed and is this justified? Could this be readily accommodated, given the sensitive location adjacent to both a registered battlefield, and a service reservoir?
6. What is the background to the specific requirements of Policy OS6? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
7. Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
8. Is the requirement for Green Belt compensatory improvements justified and appropriate?
9. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? **N.B. The Council's response should address key issues raised in representations**
10. Is the Council satisfied that safe access to the site can be secured?
11. Is the development proposed viable and deliverable within the period envisaged, noting that it is anticipated that first homes would be completed in 2024/5?
12. What is the situation in relation to land ownership and developer interest?
13. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
14. Are any main modifications necessary for soundness?

Matter 8 – Housing land supply

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to housing land supply.

Questions

1. What is the up to date situation regarding actual housing completions so far in the plan period i.e. 2021/22?
2. For each of the following sources of housing land supply for the whole plan period in turn, what are the assumptions about the overall scale, lead in times, timing and annual rates of delivery? What is the basis for these assumptions and are they realistic and justified?
 - a) SHLAA sites under construction
 - b) SHLAA sites with planning permission but not started (split by outline and full)
 - c) SHLAA sites without planning permission
 - d) Small site allowance (windfalls)
 - e) Each of the Main Development Areas involving housing
 - f) Each of the site allocations in outlying settlements
3. Would there be an adequate supply of housing land for the whole plan period?
4. Overall, would at least 10% of the housing requirement/target be met on sites no larger than one hectare (in light of paragraph 69 of the NPPF)?
5. In terms of a five year supply and paragraph 74 of the NPPF, is a 20% buffer appropriate?
6. Taking 2022/23 as the base year, what would be the five year requirement (assuming the stepped annual requirement and adding any shortfall or subtracting any surplus in delivery since 2021 before applying a buffer)?
7. What would be the supply for this period (in total and by each source of supply)?
8. Are the assumptions on the sources of supply for this period realistic and justified?
9. Would there be a five year supply of housing land (from 1st April 2022)?

Matter 9 – Other housing policies

Issue

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach to housing density, meeting housing needs and Gypsy, Traveller and Travelling Showpeople provision.

Relevant policies DEV1 to DEV3

Questions

Housing density (Policy DEV1 parts 5 and 6)

1. What is the basis for the minimum densities set out in Policy DEV1? Are they realistic and justified?
2. How will “locations that are well served by frequent bus or train services” be defined and is this sufficiently clear?
3. Is the policy sufficiently flexible to allow particular circumstances to be taken into account?

Meeting housing needs (Policy DEV2)

4. What is the evidence in terms of affordable housing need and what does it show?
5. What are the past trends in affordable housing delivery in terms of completions and housing forms? How is this likely to change in the future?
6. Should the threshold for seeking affordable housing reflect the definition of major housing development in the NPPF i.e. 10 dwellings or more or a site area of 0.5ha or more?
7. What is the basis for the percentages of affordable housing sought and are they justified?
8. Does the evidence on viability support the approach to affordable housing in Policy DEV2?
9. Is there sufficient flexibility to take account of site specific viability issues?
10. In other respects, is the approach to affordable housing justified, effective and consistent with national policy?
11. Is the approach to the mix of housing sizes and types justified? Is it intended to apply this policy to all developments regardless of size?
12. Is there justification for the use of Nationally Described Space Standards in terms of need and the effect on viability?
13. How will “appropriate outdoor amenity space” be defined?
14. Are the requirements for Accessible and Adaptable dwellings and Wheelchair User dwellings justified and consistent with national policy? How has the effect on viability been taken into account?
15. Is the approach towards housing for older people justified? How would part 18 of Policy DEV2 be implemented in practice, what is meant by housing for older people

and to what extent is this issue covered by the approach to Accessible and Adaptable dwellings and Wheelchair User dwellings?

16. Is the approach towards self and custom build housing justified? How will it be implemented?
17. Is the approach towards Houses in Multiple Occupation justified? How will the criteria in part 21 of Policy DEV2 be applied and defined, particularly criterion a)?

Gypsy, Traveller and Travelling Showpeople provision (Policy DEV3)

18. Is the evidence on accommodation needs for Gypsies and Travellers and Travelling Showpeople robust and consistent with national policy and does it cover an appropriate time period?
19. Is the approach to meeting needs set out in Policy DEV3 justified and consistent with national policy, including the reference to a review of the Local Plan? What is the up to date situation regarding the existing supply of pitches and plots?
20. Should sites be allocated in this Local Plan or provision made within proposed Main Development Areas and/or site allocations?
21. Are the criteria for considering proposals for new sites justified?

Main modifications

22. Are any main modifications to the above policies necessary for soundness?

Matter 10 – Retail, leisure and the Town Centre

Issue

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach to retail, leisure and the Town Centre.

Relevant policies DEV5 and TC1

Questions

Meeting retail and leisure needs (DEV5)

1. What is the evidence base for determining the provisions of Policy DEV5 in setting out the hierarchy of centres providing for the range of shops, services and facilities across the Borough? Are the provisions of this policy justified and will they be effective across the plan period?
2. Does the hierarchy of centres reflect the requirement to make clear the range of uses permitted in town centres/primary shopping areas as part of a positive strategy for each centre?
3. Does the strategy clearly define the roles of each level of the hierarchy, for example the difference between local centres, neighbourhood centres and neighbourhood hubs?
4. Given the limited provision of local centres/neighbourhood hubs in south Warrington, and the extent of housing and employment development envisaged in this area, will the Local Plan adequately provide for necessary services and facilities?
5. Are the requirements of Policy DEV5 points 5 to 7 consistent with the NPPF paragraphs 87-91?
6. Is the threshold set at Policy DEV5 point 7 for impact assessments being required for proposals over 500m² justified?
7. Are the provisions of Policy DEV5 point 8 consistent with national policy? How does this align with the requirements of Policy INF4, particularly in relation to cultural facilities?
8. In relation to the provisions of Policy DEV5 point 8b., does the Council's Hot Food Takeaway SPD 2014 reflect the PPG on healthier food environments?

Role of Town Centre (TC1)

9. What is the role and status of Warrington's economic growth and regeneration strategy – Warrington Means Business (6.1.6)? Is this sufficiently clear?
10. What is the relationship between Policy TC1 and the provisions of the Warrington Town Centre SPD?
11. Given the requirement at Policy TC1 point 5. to comply with the requirements of the Town Centre SPD, will the policy be effective and consistent with national policy relating to SPD?

12. Is the approach to key development sites in the Town Centre sufficiently clear and detailed?
13. Is the potential for housing development in the Town Centre realistic and supported by robust evidence?
14. How will a balance between regeneration to create a vibrant hub and residential amenity for multi-generational living be achieved?
15. Do the parameters for taller buildings (TC1 point 6.) need to be defined?
16. Is the viability assessment of town centre sites up to date and robust?
17. Could viability issues mean that the qualitative requirements for new accommodation in the Town Centre may not be met?
18. In seeking to improve the Town Centre's environment, does Policy TC1 give sufficient support to safety/security matters?

Main modifications

19. Are any main modifications to the above policies necessary for soundness?

Matter 11 – Transport and other infrastructure

Issue

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach to transport and other infrastructure.

N.B. wider issues of infrastructure provision and the links with viability are dealt with under Matter 3

Relevant policies INF1 to INF6

Questions

Sustainable travel and transport (INF1)

1. Is Policy INF1 intended to be applied to all development, regardless of scale and type? If not, is this clear?
2. Are all of the points in Policy INF1 genuinely related to development proposals or do some actually reflect the Council's potential actions? How could the policy be rationalised to be more focussed on reasonable expectations of development?
3. In other respects, is Policy INF1 justified, effective and consistent with national policy?

Transport safeguarding (INF2)

4. What is the basis for safeguarding land for the specific schemes in part 2 of Policy INF2? What is the status of the schemes in terms of progress and funding commitments etc?

Utilities, telecommunications and broadband (INF3)

5. Is Policy INF3 intended to be applied to all development, regardless of scale and type? If not, is this clear?
6. In other respects, is Policy INF3 justified, effective and consistent with national policy?

Community facilities (INF4)

7. What is the up to date situation regarding a new hospital and the potential need for a new site? Could this be accommodated within the policy framework of this Local Plan?
8. In other respects, is Policy INF4 justified, effective and consistent with national policy?

Delivering infrastructure (INF5)

9. Is Policy INF5 sufficiently flexible in terms of taking account of the impact on viability?
10. Is the approach to a review mechanism for planning obligations justified?
11. In other respects, is Policy INF5 justified, effective and consistent with national policy?

Aerodrome safeguarding (INF6)

12. Is Policy INF6 justified, effective and consistent with national policy?

Main modifications

13. Are any main modifications to the above policies necessary for soundness?

Matter 12 – Warrington’s historic, cultural, built and natural assets

Issue

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach to the Borough’s historic, cultural, built and natural assets.

Relevant policies – DC1 to DC6

Questions

Warrington’s places (DC1)

1. What is the relationship between provisions for the Town Centre in Policy DC1 and in Policy TC1? Do the provisions for Inner Warrington exclude the Town Centre?
2. What is the nature and status of the Central Six Regeneration Masterplan?
3. Will the Town Centre housing density requirements, as set out at Policy DEV1 point 5 a and b, impact on the ability to achieve the Policy DC1 point 2e. relating to improving the Inner Warrington housing offer to provide a range of tenures and types of dwellings?
4. Will viability issues in Inner Warrington impact on the ability to achieve the requirement at Policy DC1 point 2f. to provide sufficient amounts and types of affordable housing in accordance with Policy DEV2 to meet specific local needs?
5. Do provisions for Suburban Warrington provide a sufficient focus on the creation of a high-quality environment?
6. Does Policy DC1 protect and enhance the distinctive character of Warrington’s places?
7. Is the relationship between the provisions of Policy DC1, points 8 to 10, and Policy GB1 sufficiently clear, particularly in relation to the release of Green Belt land at Policy DC1 point 9?
8. Should the specific provisions for Warrington’s visitor attractions include reference to biodiversity enhancements (at points 12, 15 and 19)?
9. Overall, is Policy DC1 effective, justified and consistent with national policy?

Historic environment (DC2)

10. Does Policy DC2 provide an appropriate framework for conserving and enhancing the historic environment which is consistent with national policy?
11. Does Policy DC2 provide adequate protection for non-designated heritage assets, including historic designed landscapes?
12. Are the tests set out at Policy DC2 point 4 relating to designated heritage assets consistent with the NPPF paragraphs 199 to 202?
13. Overall, is Policy DC2 effective, justified and consistent with national policy?

Green infrastructure (DC3)

14. Does Policy DC3 provide an appropriate framework for conserving and enhancing the green infrastructure which is consistent with national policy?
15. Does the plan meet the requirement of the NPPF paragraph 174 to protect and enhance valued landscapes?
16. Is the distinction between provisions for green infrastructure (Policy DC3) and open space and recreation provisions (Policy DC5) sufficiently clear? Should their provisions be separately identified on the Policy map?
17. Overall, will Policy DC3 be effective?

Ecological network (DC4)

18. Is the wording of Policy DC4 effective in ensuring the protection of biodiversity and geodiversity?
19. Should Policy DC4 requirements be strengthened to reflect the provisions of the Environment Act 2021?
20. Should Policy DC4 set out a requirement for all development to achieve a minimum 10% net biodiversity gain (NBG) ahead of legislation?
21. Could ecological networks and opportunity areas be more clearly identified/mapped out as a basis for a Local Nature Recovery Strategy in line with the Environment Act 2021?
22. Are the provisions of Policy DC4 effective in comprehensively reflecting the Borough's ecological assets?
23. Do Policy DC4 provisions at point 3. appropriately reflect national policy for the protection of the European sites?
24. Should Policy DC4 make reference to the importance of trees and soils in carbon capture and storage?
25. Should Policy DC4 make provision for the protection of ancient woodland/ veteran trees?
26. Overall, is Policy DC4 effective, justified and consistent with national policy?

Open space, sport and recreation provision (DC5)

27. Are the provisions in Policy DC5 for open space and recreation justified and consistent with national policy?
28. Is the evidence base underpinning Policy DC5 up to date?
29. Do the provisions of Policy DC5 allow for consideration of viability matters, where appropriate?

30. Should Policy DC5 set out how size and quality requirements for open space and recreation provision should be identified/calculated?
31. Should Policy DC5 have regard to the differences between delivering housing within the Town Centre, and other parts of the existing urban area, in terms of the implications for the nature of open space provision?
32. Overall, is Policy DC5 effective?

Quality of place (DC6)

33. Is Policy DC6 effective, justified and consistent with national policy?
34. Should Policy DC6 address fire safety matters?
35. Should Policy DC6 clarify measures relating to energy efficiency?
36. With reference to Policy DC6 point 6., in what circumstances does the Council expect masterplans and design codes to be prepared for development sites?

Main modifications

37. Are any main modifications to the above policies necessary for soundness?

Matter 13 – Other policies

Issue

Whether the Local Plan is justified, effective and consistent with national policy in relation to waste management, flood risk and water management, minerals, energy and environmental and amenity protection.

Relevant policies ENV1 to ENV8

Questions

Waste management (ENV1)

1. What is the current situation in relation to waste arisings and the cross boundary movement of waste?
2. What is the current situation regarding capacity in waste management facilities?
3. Is the approach to proposals for waste management facilities justified?
4. In other respects, is Policy ENV1 justified, effective and consistent with national policy?

Flood risk and water management (ENV2)

5. What is the situation in terms of flood risk across the Borough and how has this informed the Spatial Strategy and the identification of Main Development Areas and site allocations?
6. Is Policy ENV2 justified, effective and consistent with national policy?

Minerals (ENV3 to ENV6)

7. Is the approach to the safeguarding of mineral resources in Policy ENV3 justified, effective and consistent with national policy?
8. To what extent are any of the Main Development Areas or site allocations affected by Mineral Safeguarding Areas and where they are how will this issue be addressed?
9. What is the current situation in terms of landbanks for aggregates and how is it intended to address any shortfalls?
10. Is the approach to the primary extraction of minerals in Policy ENV4 justified, effective and consistent with national policy?
11. Is the approach to energy minerals in Policy ENV5 justified, effective and consistent with national policy?
12. Is the approach to the restoration and aftercare of mineral and waste sites in Policy ENV6 justified, effective and consistent with national policy?

Renewable and low carbon energy development (ENV7)

13. What is the basis for the requirements for allocations and other major development proposals to meet 10% of energy needs from renewable and/or other low carbon

energy sources or to reduce carbon emissions by at least 10% when measured against Building Regulation (Part L)? How would it be implemented in practice?

14. How has the effect on viability been taken into account and is the approach justified and consistent with national policy?

15. Is the approach to renewable and low carbon infrastructure justified and consistent with national policy?

Environmental and amenity protection (ENV8)

16. What is the current situation in terms of air quality in the Borough?

17. How have air quality impacts been taken into account in preparing the Local Plan and identifying allocations?

18. Is the approach towards air quality impacts on the Manchester Mosses SAC and potential mitigation justified and effective? How does the approach in Policy ENV8 link with the findings of the HRA?

19. In other respects, is Policy ENV8 justified, effective and consistent with national policy?

Main modifications

20. Are any main modifications to the above policies necessary for soundness?

Matter 14 – Monitoring and review

Issue

Whether the approach to monitoring and review is justified, effective and consistent with national policy.

Relevant policy M1

Questions

1. How will the implementation and effectiveness of the Local Plan be monitored? Will the monitoring framework in Appendix 2 provide an effective basis to do this?
2. How will any issues of delivery of housing be identified and addressed? Will this be effective?
3. How will any issues of delivery of the Main Development Areas be identified and addressed? Will this be effective?
4. What is the overall approach to reviewing the Local Plan?
5. Are any main modifications to Policy M1 necessary for soundness?