

Warrington Local Plan Examination - Matters, Issues and Questions identified by the Inspectors

Response from Natural England 22/07/2022

Matter 1 – Procedural/legal requirements

Habitats Regulations Assessment

11. How was the Habitats Regulations Assessment (HRA) for the Local Plan carried out and reported?

Natural England are satisfied that the HRA has been carried out in accordance with the regulations and that we have been consulted at formal consultation stage and via ongoing, informal discussions. The HRA document was submitted alongside the Regulation 19 Local Plan.

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?

Natural England are satisfied that the appropriate methodology was used when screening and assessing impacts associated with mineral extraction and air quality impacts, except for the assessment of air quality impacts to Holcroft Moss (Manchester Mosses Special Area of Conservation (SAC)) which is ongoing.

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?

Aside from the outstanding issue in relation to the potential impact of the Local Plan on Holcroft Moss (Manchester Mosses SAC), Natural England are satisfied that an appropriate level of assessment of the in-combination effects of the allocations and infrastructure proposed has 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?

Natural England are involved in regular discussions with Warrington Council in relation to the ongoing assessment of potential air quality impacts to Holcroft Moss (Manchester Mosses SAC). Warrington Council have advised us that the additional air quality modelling they have undertaken shows that the Plan contribution 'alone' is less than 1% of the site critical level/load, but when considered in-combination with Greater Manchester's Places for Everyone Plan the 1% threshold is exceeded. As yet, we have not seen a detailed in-combination assessment as part of the HRA that clearly outlines the identified impacts. Natural England are working closely with Warrington Council and Greater Manchester Combined Authority as they continue to work on their in-combination assessments and consider potential options to mitigate the identified impact, although we do have concerns that we may not be able to reach a solution that provides the required certainty before the examination commences.

Due to ongoing conversations with Warrington Council leading up to the hearings, Natural England may have additional comments to make in relation to the outstanding issue either via an additional written representation or by appearing at the hearing in person.