

EiP Statement

Warrington Updated Proposed Submission

Version Local Plan 2021-2038 (September 2021)

Bellway Homes (Manchester)

Representor ID UPSVLP 2460

Our ref 64008/02/SPM

Date August 2022

Subject Matter 7d: Site Allocations – Lymm (Policy OS5 – Rushgreen Road)

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of Bellway Homes (Manchester Division) [Bellway] (Respondent No: 2460) in relation to Matter 7d (Site Allocations – Lymm (Policy OS5 – Rushgreen Road)).
- 1.2 This Statement has been written in support of the allocation of Bellway’s land interest at Tanyard Farm, Lymm in the Warrington Updated Proposed Submission Version Local Plan 2021-2038 (September 2021) [WUPSVLP] (Policy OS5 – Rushgreen Road).
- 1.3 However, Bellway also consider that the allocation should be extended to include additional land that the Council show removed from the Green Belt. This land (known as Parcel B) (shown in Appendix A) was included within the wider site allocation at Lymm (Rushgreen Road/Tanyard Farm) in the Council’s previous Proposed Submission Version Local Plan [PSVLP] (March 2019) (Policy OS7). Inclusion of Parcel B within the allocation would create a logical extension to the approved residential scheme at Tanyard Farm (ref. 2017/31816) (Phase 1), in which Bellway is nearing completion on the delivery of 64 no. new homes.
- 1.4 This Statement has been prepared in response to the Matters, Issues and Questions [MIQ] raised by the Inspector for the Matter 7d Examination in Public [EiP] hearing sessions concerning the Site Allocation in Lymm – Rushgreen Road (Policy OS5).
- 1.5 Bellway and the landowners have previously submitted representations in relation to WUPSVLP call for sites, Regulation 18 and 19 consultation stages of the Plan in support of the site and concerning the overall strategy and other proposed policies.
- 1.6 Separate statements have been submitted in respect of the following Matters:
- 1 Matter 3 – The Spatial Strategy; and,
 - 2 Matter 8 – Housing land supply.

- 1.7 This Statement expands upon the representations to the WUPSVLP and focuses on the Inspector's specific MIQ's. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [NPPF] and the National Planning Practice Guidance [Practice Guidance].
- 1.8 Alongside the land at Tanyard Farm, Lymm, Bellway is also promoting additional land at Deacons Close, Croft (Policy OS1 – Croft) and land at Golborne Road (Policy OS6 – Land to the north of Winwick) to contribute towards the council's requirement for new homes in the Borough. Bellway support all these allocations within the WUPSVLP.

2.0 Questions: Policy OS5 – Rushgreen Road

Question 1: What is the background to the site allocation and how was it identified?

- 2.1 The land to the east of Lymm comprises two land parcels:
- 1 Land at Tanyard Farm (eastern land parcel) (Site Ref: R18/118 / Site Ref: R18/P2/054 / R18/P2/133 / R18/P2/085) – Promoted by Bellway; and,
 - 2 Land at Thirlmere Drive (western land parcel) (SHLAA Ref: 1504 / Site Ref: R18/018 / Site Ref: R18/P2/055) – Promoted by Landowner.
- 2.2 Bellway and the landowner have promoted the land at Tanyard Farm, which makes up to majority of this site allocation, at every stage of the plan process. This included the Call for Sites exercise in October-December 2016; the Preferred Development Option [PDO] Regulation 18 Consultation Document in September 2017.
- 2.3 The allocation was identified through a site selection methodology undertaken in line with the Council's preferred spatial strategy of 'incremental growth' in outlying settlements. An explanation of the Council's site selection methodology is set out in its 2021 Development Options and Site Assessment Technical Report.
- 2.4 The eastern land parcel was assessed in detail in November 2018 where it was determined to be suitable for development¹. The Council's Settlement Proforma – Site Selection Report (2018) concluded:

“The site is adjacent to the settlement of Lymm, located to the east of the settlement close to Rush Green Road. The site is considered to be in a sustainable location and is available having been promoted by the site owner and being free from ownership issues. The site may be achievable as there is developer interest and known demand and no known abnormal development costs. The site has been judged to be suitable - unlikely to have a major impact on trends. As such, the site would be in accordance with the objectives set out in the draft Warrington Local Plan including objective W1 to strengthen existing neighbourhoods, W2 to facilitate the sensitive release of Green Belt, W4 to promote sustainable modes of transport, and W6 to minimise the impact of development on the environment.”

¹ Proposed Submission Version Local Plan Site Assessment Proformas (2019)

- 2.5 The same conclusions for the western portion of the site allocation comprising Land at Thirlmere Road are also evidenced in the 2018 Report.
- 2.6 The suitability, availability and achievability of these two parcels of land is also demonstrated in the Council’s Development and Site Assessment Technical Report (September 2021). These reports also evidence the suitability, availability and achievability of Parcel B (included within ref. R18/P2/085). Consequently, Bellway considers that the allocation boundary should be extended to include Parcel B.
- Question 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?*
- 2.7 The Council published its original Green Belt Assessment in 2016, which provided an assessment of General Areas and land parcels across the borough. The site allocation fell within the assessment of a wider land parcel (ref. LY16), which concluded that the parcel made a moderate overall contribution to the green belt, concluding that:
- “...while it supports a strong degree of openness and it has non-durable boundaries with the settlement, the parcel only has a limited connection with the countryside along one boundary and the durability of this boundary with the countryside means that any encroachment resulting from development would be contained and would therefore not threaten the openness and permanence of the Green Belt as a whole.”*
- 2.8 In July 2017, the first of the Green Belt individual Site Assessments was published for the Regulation 18 Part 1 and SHLAA sites. The two land parcels that make up the site allocation were assessed separately. The eastern (ref. R18/118) and western (ref. R18/018) parts of the site allocation was assessed as having a weak overall contribution to the Green Belt.
- 2.9 Following this, in May 2018, the second batch of Green Belt site assessments was published covering Regulation 18 Part 2 sites. The eastern part of the site allocation was assessed as part of a wider site (referred within the report as Land at Tanyard Farm, Lymm (site ref: R18/P2/085 and P18/P2/132) which again concluded that the site made a weak overall contribution to the Green Belt:
- “In line with the methodology, the site has been judged to make a weak contribution. This site has two less durable boundaries with the countryside and supports a weak degree of openness due to the existing built form on the site which reduces its openness.”*
- 2.10 The site (including parcel B) was also considered within the Council’s Green Belt Site Selection – Implications of Green Belt Release Report (August 2021). This report concluded that, due to the majority of the site already developed with a gym and car park, airport car parking, a garage, agricultural buildings, a farm shop and a café, the removal of the site from the Green Belt alongside the adjacent site (SHLAA Ref: 1504 / Site Ref: R18/018 / Site Ref: R18/P2/055) would not harm the overall function and integrity of the Green Belt around Lymm, and will instead create a new recognisable and permanent Green Belt boundary.

- 2.11 Additionally, the report concluded that whilst development of the western part of the allocation would entail a very small incursion into undeveloped countryside, the removal of the site from the Green Belt, alongside the adjacent site (referred to above) would not harm the overall function and integrity of the Green Belt around Lymm.
- 2.12 Bellway agrees with the findings of these assessments and supports the removal of the totality of the site from the Green Belt. It is however noted that this assessment does not however reflect the situation now ‘on the ground’ given that Bellway has nearly completed the Phase 1 development of 64no. homes directly north of Parcel B. This further weakens Parcel B’s contribution to the Green Belt purposes.
- 2.13 Given that the conclusions of the Green Belt Assessment (August 2021) evidence that the land inclusive of Parcel B makes a weak overall contribution to the Green Belt, Parcel B should also be included within the site allocation.
- 2.14 It is considered that the Green Belt boundary as shown in the submission plan would create a logical defensible edge to the amended urban settlement, whilst delivering a logical extension to the planning approval granted at Tanyard Farm (ref. 2017/31816). The provision of additional homes would also contribute further to meeting the borough’s housing need requirements in the early part of the Plan period.
- Question 3: What would be the effect of developing the site on the purposes of the Green Belt?*
- 2.15 The Council’s evidence²³ concludes that the site allocation makes a moderate contribution to two purposes of the Green Belt, and no contribution to three purposes, and therefore an overall weak contribution.
- 2.16 Development of the site would have no impact on Purpose 1 of the Green Belt, given that the site is not connected to the large built-up area of Warrington. Thus, its development would not represent unrestricted sprawl of the existing built-up settlement boundary.
- 2.17 The development of the site would also have no impact on Purpose 2. The site is enclosed by the existing settlement, situated to the northeast, west and southwest, and therefore developing the site would have no impact on preventing neighbouring towns from merging.
- 2.18 The Phase 1 land adjacent the allocation benefits from planning permission to erect dwellings (ref. 2017/31816), which is currently under construction by Bellway. Therefore, the site only makes a moderate contribution to safeguarding from encroachment, due to its mix of durable and less durable boundaries and weak degree of openness resulting from existing approved development on the site.
- 2.19 Although Lymm is a historic town, as shown within the Heritage Impact Assessment for the Outlying Settlements (2021), the site makes little to no contribution to surrounding listed buildings or the Lymm Conservation Area, and its allocation for development is unlikely to

² Green Belt Site Selection – Implications of Green Belt Release Report (August 2021)

³ Green Belt Site Assessments Collated Report (September 2021)

result in harm to the significance of surrounding assets. Consequently, development of the site will not impact on Lymm's historic setting and special character.

2.20 The Mid Mersey Housing Market Area only has 2.08% brownfield urban capacity to bring forward potential development in accordance with Purpose 5. Therefore, whilst the site moderately contributes to this purpose, the Council acknowledge that developing on greenfield sites in the borough, including at Tanyard Farm, Lymm is essential to meet Warrington's housing requirements.

2.21 Overall, the development of the site would have a minimal impact on the purposes of the Green Belt. Due to the assessment on land at Tanyard Farm, Lymm including Parcel B, should be included within the allocation to bring forward much-needed housing within the borough.

Question 4: Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?

2.22 Bellway agrees that an exceptional circumstances case has been demonstrated for the release of Green Belt land around the outlying settlements, including Lymm. The WUPSVLP [§3.4.1 to §3.4.16] sets out the exceptional circumstances sought by the NPPF [§140] to justify the release of Green Belt land. This includes a demonstration of the exceptional circumstances for each area, including the outlying settlements, the purpose of which is to meet housing needs, increase housing choice, and, support the vitality and viability of local services, and provide land for a new much needed health centre.

2.23 As evidenced in the WUPSVLP [§10.10.4], the site performed well in terms of the assessment against the objectives of the Local Plan, the requirements of the NPPF and the Local Plan's Sustainability Appraisal. However, the same conclusions are evidenced within the Council's PSVLP (March 2019) [§10.11.4] for the previously proposed site allocation (inclusive of Parcel B).

2.24 Given that the site, including Parcel B, is considered to be suitable, available and achievable⁴, the release of Parcel B from the Green Belt and its inclusion within the site allocation would add increased flexibility to the housing trajectory and would help to deliver much-needed housing within the early part of the Plan period.

Question 5: What is the basis for the scale of development proposed and is this justified?

2.25 Policy OS5 allocates Land to the east of Lymm (Rushgreen Road) for a minimum of 136 homes alongside a new health facility of a minimum of 1,500sq.m, the need for which is demonstrated in the Council's Infrastructure Delivery Plan (2021). Part 6 of the policy states that the development should be constructed to an average minimum density of 30 dph to reflect the site's location adjacent to the countryside.

2.26 The scale of development proposed is based on the site's net developable area, inclusive of the infrastructure requirements on-site, including the delivery of the health facility and public open space.

⁴ Development Options and Site Assessment Technical Report (September 2021)

- 2.27 Bellway considers that Parcel B should be included within the site allocation to make efficient and effective use of this land. Consequently, the scale of development should be increased to take account of the site's increased developable area. Policy OS5 should therefore be amended to require a minimum of 170 homes alongside a new health facility to be delivered.
- 2.28 The site is situated in a sustainable location, as evidenced by the Council's Sustainability Appraisal [SA] (August 2021) being located adjacent to the existing urban area. Therefore, the scale of development proposed will make the most efficient use of land and contribute towards the identified housing needs of the Borough, and Lymm specifically, in accordance with the NPPF [§124], whilst achieving the minimum density requirements evident in Policy DEV1 and Policy OS5.
- Question 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?*
- 2.29 Part 3 of Policy OS5 requires a range of requires a range of housing tenures, types and sizes to be provided in order to ensure development contributes to meeting the Borough's general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. It is not clear what is meant by generalist and specialist housing needs and the how the applicant and decision-maker should interpret this. Suggested amendments to Part 3 are identified in our response to Question 14.
- 2.30 Part 5 of Policy OS5 states that specific provision should be made for self-build/custom build plots, subject to local demand as demonstrated by the Council's self-build register. This requirement is not clear or effective because it would not guarantee the delivery of self and custom build housing. The Council already has a legal obligation to grant sufficient planning permissions to meet the demand for self-build and custom housebuilding. As local demand for such plots across the Borough is unknown, the Council cannot rely on this allocation as a source of supply. We note that the Council's commitment to delivering of self-build plots is set out in Policy DEV2, so there would still be a mechanism in place for the Council to secure self and custom build plots if the requirement is removed from Policy OS5.
- 2.31 Bellway considers that Part 10 of this policy (in relation to Open Space and Recreation) does not accord with national policy as it is currently worded. The need for leisure facilities and playing pitch provision needs to be demonstrated through the appropriate evidence, including an assessment of existing provision. We have therefore suggested an amendment in our response to Question 14 below to ensure soundness.
- 2.32 Part 18 of Policy OS5 sets out that a site-wide surface water strategy is required to incorporate SUDS and flood alleviation measures. the requirement to deliver 'flood alleviation measures' is not an appropriate term. The site is in Flood Zone 1 and has a low risk of flooding. Any future application will be accompanied by a site-specific flood risk assessment that considers surface water and overland flow routes, and the conclusions of this will inform the required surface water strategy. There are other relevant policies in the

plan relating to these matters and we would suggest that this part of the draft policy is deleted. Suggested amendments to the wording of Part 14 are shown in our response to Question 14.

- 2.33 Part 20 of the policy currently states that “*improvements to the water supply and sewerage network will be required...*” Bellway does not object to the principle of these improvements if they are required. However, it is Bellway’s understanding that there are no utilities constraints at the site and therefore requiring such improvements is not justified. Amendments to Part 20 are suggested below.

Question 7: Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?

- 2.34 Part 7 of Policy OS5 – Lymm (Rushgreen Road) sets out that development will be required to make a contribution towards the provision of additional primary and secondary school places to meet the need for school places that will be generated from the development. As mentioned in previous representations for the site⁵, flexibility should be incorporated into the wording of this criterion such that an assessment is made based upon the most up-to-date evidence at the time of a planning application. It may be that a contribution toward school places is not necessary, and this will depend on school capacities and the number of pupils on the roll for local primary and secondary schools.

- 2.35 Part 8 of the policy states that development will be required to provide for a new primary health care facility of a minimum of 1,500 sq.m. The supporting text [§10.10.7] states that the final size and nature of the facility will need to be confirmed with the Warrington Clinical Commissioning Group (CCG). The supporting text should confirm how this facility will be delivered or funded, and that the requirement from this site is to provide the land in lieu of any financial contribution.

Question 8: Is the requirement for Green Belt compensatory improvements justified and appropriate?

- 2.36 Part 14 of the policy requires a scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt to be provided. It advises that financial contributions will be considered.

- 2.37 Bellway do not object to the requirement for Green Belt compensation in principle. However, as currently worded, the requirement for Green Belt compensatory improvements to be delivered on land remaining in the Green Belt could become onerous for developers whose option agreements are likely to be contained to the specific site allocation/s to be removed from the Green Belt. This approach could risk the creation of ransom situations with landowners with unallocated sites within the Green Belt.

- 2.38 Bellway requests that the Council considers the approach taken by St Helens Borough Council. St Helens proposed supporting text to Policy LPA02 (Development Principles) to provide greater clarity on the expectations to deliver compensatory improvements to offset

⁵ Majornet Ltd & Bellway Homes – Warrington Updated Proposed Submission Local Plan Representations – Land off Rushgreen Road (Lymm) (November 2021)

the release of Green Belt land for development (Appendix B). This approach was found sound by the Inspector, who concluded that this would ensure that the Plan is consistent with national policy.⁶

- 2.39 A similar, less prescriptive approach should be sought by the Council, with the policy's supporting text detailing potential projects and schemes where Green Belt compensation could take place. Bellway requests that the Council considers setting out a mechanism for calculating contributions, which should be proportionate to the scale of development proposed within the Green Belt.
- 2.40 Amendments to the wording of Part 14 of the policy are detailed in the response to question 14.
- Question 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?*
- 2.41 A detailed Transport Assessment has been prepared and accompanies the current planning application (ref. 2022/41134) on Parcel A and B. This demonstrated that the site can be accessed via Woodyatt Way, which serves as the vehicular access to the Phase 1 development. It confirms that the existing vehicular access (Rushgreen Road/Woodyatt Way junction) will operate well within capacity and that the traffic associated with the allocation can be accommodated. In addition, it is considered that the impact on the local highway network resulting from the proposals would be minimal.
- Question 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*
- 2.42 It is considered that there are no other potential adverse effects.
- Question 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?*
- 2.43 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 and offers a suitable, sustainable location for housing. Bellway is committed to progressing a residential scheme and has submitted a planning application to secure detailed consent for housing and outline consent for a primary care facility (ref. 2022/41134). The site is therefore considered fully deliverable.
- Question 12: What is the situation in relation to land ownership and developer interest?*
- 2.44 Bellway has an option on a substantial portion of the existing site allocation (Policy OS5 – Rushgreen Road), which they intend to bring forward for housing. This land (including Parcel B) is subject to a current planning application (ref. 2022/41134) to bring forward a residential-led scheme.
- 2.45 It is understood that McCarthy and Stone have an interest in the western land parcel and have submitted a planning application to bring forward a Retirement Living scheme.

⁶ Report on the examination of the St Helens Borough Local Plan (May 2022)

Bellway's planning application does not prejudice delivery of the remaining allocation in any way.

Question 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?

2.46 Bellway are currently constructing Phase 1, directly adjacent to the site allocation's eastern boundary, which secured planning approval at appeal in August 2018 (Ref. 2017/31816). The intention is for the part of the proposed site allocation in Bellway's ownership to form a logical extension to the approved scheme. The site layout submitted in support of the live planning application demonstrates that a comprehensive scheme can be delivered on the majority of the site allocation. Additionally, the consented Phase 1 scheme has established that the land is not subject to any technical or environmental constraints that could undermine the delivery of a comprehensive scheme.

2.47 Bellway's scheme does not inhibit the adjacent McCarthy and Stone development.

Question 14: Are any main modifications necessary for soundness?

2.48 Bellway consider that the following modifications should be made to Policy OS5 before adoption of the WUPSVLP:

1 Part 1 should be amended as follows:

"Land to the east of Lymm (inset settlement) will be removed from the Green Belt and allocated for residential development for a minimum of 170 homes and a new health facility."

2 Part 3 should be amended as follows:

"A range of housing tenures, types and sizes will be required in order to ensure development contributes to meeting the Borough's housing needs."

3 The requirement in Part 5 for provision to be made for self-build/custom build plots should be deleted.

4 The following text should be added to the end of Part 10:

"...assessment of existing provision demonstrates that existing facilities have insufficient capacity to service the increase in population arising from the development."

5 Part 14 should be amended as follows:

"Delivery of compensatory improvement measures will be sought. Such measures should enhance the environmental quality and accessibility of the remaining Green Belt land, amongst other improvements."

6 Part 18 should be amended to remove reference to flood alleviation measures:

"A site-wide surface water strategy is required to incorporate appropriate Sustainable Urban Drainage Systems (SUDS)."

- 7 Part 20 should be amended to remove the requirement to deliver improvements to the water supply and sewerage network:

“Improvements to the water supply and sewerage network will be considered to ensure that surface water drainage is not combined with foul discharge.”




Appendix A: Tanyard Farm, Rushgreen Road, Lymm

Disclaimer:
 All contractors must visit the site and be responsible for taking and checking dimensions. All construction information should be taken from figured dimensions only. Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.
 This drawing is for planning purposes only. It is not intended to be used for construction purposes. Whilst all reasonable efforts are used to ensure drawings are accurate, Astle Planning and Design Ltd accept no responsibility or liability for any reliance placed on, or use made of, this plan by anyone for purposes other than those stated above.

FORMER TANYARD FARM, LYMM






LOCATION PLAN

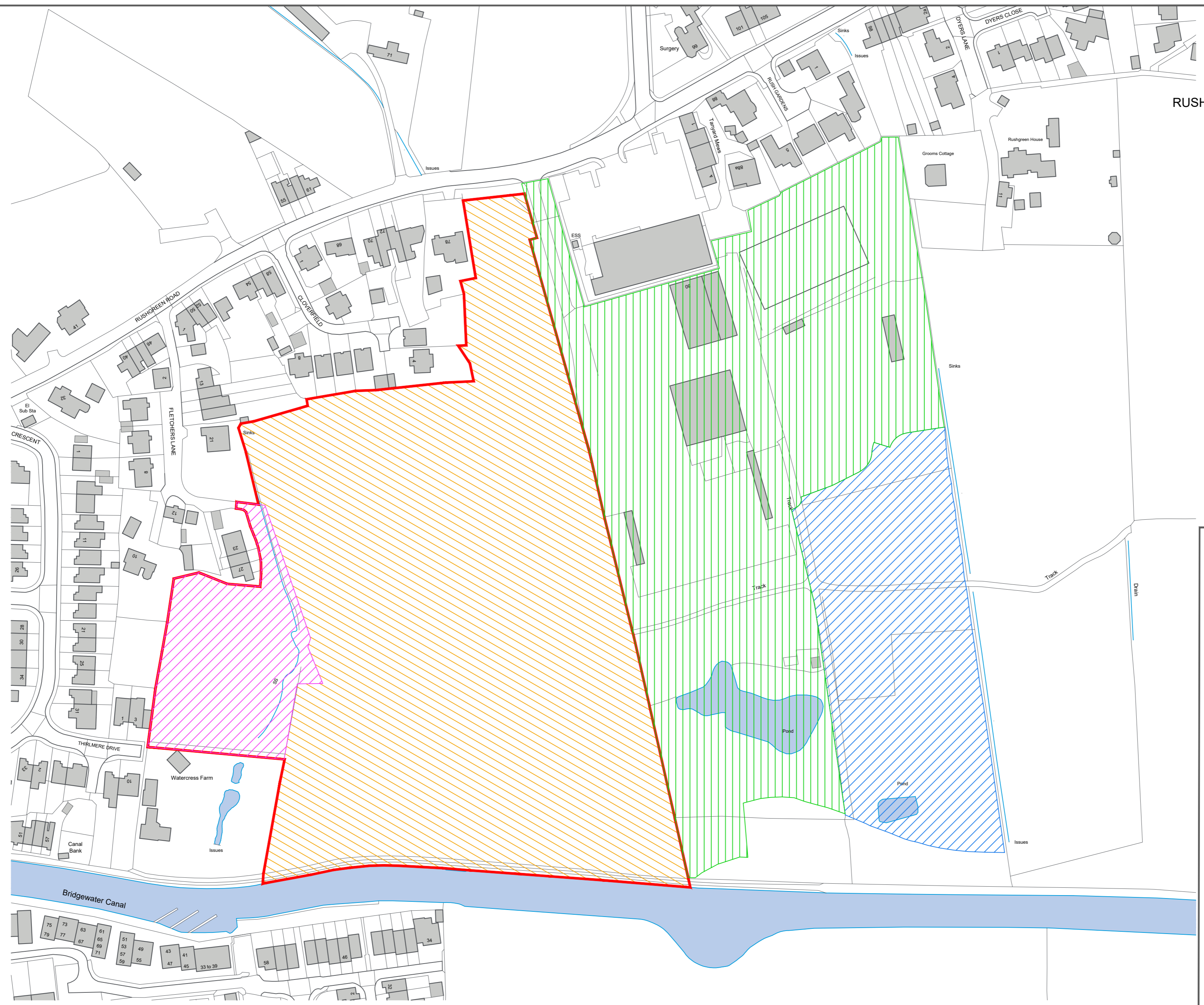
General Notes
 This drawing needs to be read in conjunction with the following plans:
 • Landscaping Layout
 • Boundary Treatment Plan
 • Materials Layout
 • Hard Surfacing Plan


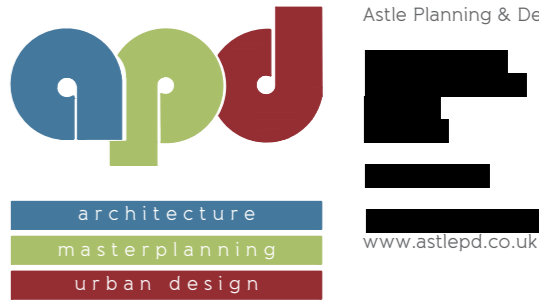


1:1250 0 12.5 25 37.5 62.5m

Key

-  Current Site Allocation
-  Separate Land Owner
-  Parcel A (Phase 2)
-  Parcel B (Phase 2)
-  Phase 1



Rev.	Date	Description	By	Chd
Client				
				
Project				
FORMER TANYARD FARM LYMM				
Drawing Title				
LOCATION PLAN				
Drawn by	RH	Checked by	MP	Date 05.08.22
Status	PLANNING			Scale @ A2 1:1250
Job no.	BHM139		Dwg. no.	LP03
				
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**Appendix B: St Helens Borough Local Plan 2020-2035 Submission
Draft – Schedule of Proposed Main Modifications (November 2021)
relating to Green Belt Compensation**

23	Reasoned Justification Paragraph 4.6.11	<p><u>whom are likely to be reliant on public transport to access employment.</u></p> <p><u>4.6.13 For all of these reasons, there are considered to be exceptional circumstances at the strategic level to justify the release of Green Belt land to meet identified development needs.</u></p> <p><i>Renumber subsequent paragraph to account for the new paragraphs</i></p> <p>“4.6.10<u>4.6.14</u> The sites that have been removed from the Green Belt”</p> <p>“4.6.11 <u>4.6.15</u> New employment development falling within use classes B1, B2 and B8 <u>and for light industrial, offices and research and development uses</u> will be primarily”</p>	Class B1 uses are now subsumed into the new Class E. Policy wording changed to reflect this and ensure policy effectiveness.
	Reasoned Justification New Paragraph after current 4.6.15 (to be renumbered to 4.6.19 following on from modifications above)	<p>“4.6.15 <u>4.6.19</u> ... Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p><u>4.6.20 In addition, the Council aims to protect and enhance remaining areas of Green Belt by seeking the delivery of</u></p>	For clarity in terms of consistency with the NPPF.

compensatory improvement measures. In accordance with paragraph 138 of the NPPF, delivery of compensatory improvement measures will be sought when sites are released from the Green Belt for development as part of this plan. Such measures should enhance the environmental quality and accessibility of the remaining Green Belt land, amongst other improvements. Further guidance is provided within the National Planning Practice Guidance (Green Belt Land).

4.6.21 The delivery of compensatory improvements will be supported by a number of policies within this Plan. For example, policies LPA09, LPC05-10 and LPC12 all have an environmental focus, which will support the delivery of Green Belt compensatory measures. Additionally, development management focussed policies, including LPD01-03 and LPD09 will support this.

4.6.22 Beyond the policy framework in this Plan to support the delivery of Green Belt compensatory measures, as well as other development plan documents, such as the Bold Forest Park AAP, the Council will continue to build on project improvements

delivered to date. Improvements include those at the strategic level, such as at Bold Forest Park, for example the expansion of tree cover and the delivery of improved recreational facilities. A further strategic level project is the Sankey Valley Corridor Nature Improvement Area (NIA), which is focussed on enhancing the aquatic environment as well as the surrounding natural environment within the catchment, and improvements in environmental management practices. Improvements in this location have included accessibility enhancements, including walking and cycling infrastructure and new signage, enabling increased access to the Green Belt for residents and visitors. It is expected that further improvements can be delivered at these two strategic projects as part of Green Belt compensatory measures.

4.6.23 There are further sites around the Borough that could be improved as part of Green Belt compensatory measures including those which form part of the Knowsley and St Helens Mosslands Nature Improvement Area (NIA), comprising three sites in the north of the Borough, near Rainford, one by Parr and one by Newton-le-Willows (see Appendix 9). In addition, there

		<p><u>are many Local Wildlife Sites (LWS) in the Borough, which are identified on the Policies Map, and Appendix 8 of this Plan shows that there are several LWS in each ward of the Borough, with many of these wards having LWS in the Green Belt. There are also three Local Nature Reserves located within the Green Belt. Compensatory measures can also occur at non-designated sites within the Green Belt, for example, initiatives related to alleviating the effects of flooding events, such as those implemented previously in the settlement of King’s Moss. Therefore, there are clear opportunities for localised Green Belt compensatory measures to be delivered on such designated and non-designated sites across the entire Borough through the delivery of environmental improvements, in addition to the two identified strategic sites referred to above.”</u></p> <p>Paragraph 4.6.17 (to be renumbered 4.6.25)</p> <p>“4.6.174.6.25 ... Open spaces and landscaping, including those provided within development sites also provide opportunities to adapt to climate change by storing flood water, reducing urban heat islands, capturing carbon and improving air quality, and therefore support the Council’s Climate Change Emergency declaration. Whilst public funding</p>	<p>For clarity, and to show link to the Council’s Climate Change Emergency Declaration.</p>
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