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6th September 2022

Dear Janet

Examination of the Warrington Local Plan

Further to the publication of your revised Matters Statement (M1.12a) I am providing an update on the actions the Council is undertaking to address the outstanding issues relating to our Local Plan Habitats Regulation Assessment (HRA) in respect of the impact on Holcroft Moss.

Ahead of the Hearing Session for the HRA on 6th October, the Council has now undertaken additional work to clarify the in-combination impact on the Moss arising from Warrington's Local Plan in combination with other relevant plans and programmes. The Council has also assessed options for providing mitigation to address this in-combination impact. The Council is confident that this work provides the basis to address Natural England's outstanding concerns and enable the finalisation of the Plan's HRA.

The Council has produced a separate technical note which describes how the Council has addressed the mitigation hierarchy in respect of the preparation of the Plan, in particular how the options assessment process has taken into account potential impacts on designated ecological assets. This demonstrates that the majority of additional traffic that will be generated on the M62 from the Local Plan will be from development within the existing urban area, including a number of large sites which have planning consent immediately adjacent to the M62.

As you are aware, the Council has also held initial discussions with National Highways on the air quality issues relating to Holcroft Moss and the potential mitigation measures. National Highways has expressed concern that the Council's air quality modelling work may have overestimated the impact on the Moss. Further, even if the impact has been correctly assessed, National Highways consider that the scale of impact is minimal and that the additional mitigation measures being proposed are disproportionate.

The Council has therefore agreed with National Highways that it will undertake a sensitivity test to model the impact using a methodology agreed with National Highways. A definitive timescale cannot be given now but it is hoped that the work can be completed ahead of the



WARRINGTON

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Hearing session on 6th October. Based on our discussions with National Highways, it is expected that any sensitive test would reduce the impact and therefore the current Warrington modelling is considered to be the most precautionary approach. Once the sensitivity test is more progressed, we would ask Natural England to liaise with the Council and National Highways to seek to arrive at a consistent view.

The Council is obviously frustrated that it is being provided with potentially contradictory advice from two statutory Government Agencies regarding the need for mitigation but remains committed to ensuring that Natural England are satisfied with the Plan's HRA.

The Council is grateful for the opportunity for ongoing dialogue with Natural England and is happy to respond to any queries on the enclosed additional work ahead of the Hearing Session on 6th October.

Yours sincerely

A handwritten signature in black ink that reads "Michael Bell".

Michael Bell
Planning Policy & Programmes Manager

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CC: Kerry Trueman, Programme Officer
CC: John Hope, National Highways