



Michael Bell
Planning Policy and Programmes
Manager
Warrington Borough Council

Our Ref:
Date:

PINS/M0655/429/2
16 December 2022

Dear Mr Bell,

Examination of the Warrington Local Plan

1. Following the final scheduled hearing session on 6 October 2022, we have now received all of the outstanding items of information and evidence requested. We have also received comments from a number of participants on relevant documents produced during the hearing sessions. In the light of all of this we are now able to set out the way forward for the examination. We would like to take this opportunity to re-iterate our thanks to you and your colleagues for your constructive and helpful approach throughout the examination.
2. As we said at the hearing session on 6 October, we are satisfied that the Council has complied with the duty to co-operate. We have concluded that the submitted Local Plan is not sound as it stands. However, we consider that it can be made sound by main modifications and that subject to consultation on such main modifications we can proceed with our report and the Local Plan could be adopted within a reasonable timescale. At this stage we wanted to highlight our conclusions on the key issues of soundness, before dealing with detailed matters relating to the wider range of main modifications required.

Housing need and the housing requirement

3. The Council has taken an appropriate approach to the assessment of local housing need using the standard methodology in national planning policy guidance (PPG). The Local Plan is justified in setting out a housing requirement which matches local housing need i.e. an average of 816 homes per annum and a minimum of 14,688 over the plan period from 2021/22 to 2038/39. It is also justified in setting out a stepped approach to the requirement with an annual average requirement of 678 for the first five years and an annual average of 870 homes for the remainder of the plan period. This reflects the timescales to realistically bring forward some site allocations on land currently in the Green Belt and for infrastructure to be put in place to support the development of larger sites.

Employment land requirement

4. The refresh to the Economic Development Needs Assessment of August 2021 – Document EC2 (the EDNA) provides the basis for the employment land requirement in the submitted Local Plan. Average land take up for strategic and local purposes (i.e. including the Omega site) was 14.22ha per annum between 1996 and 2020. The EDNA recommends that this

past annual take up rate is projected forward over the plan period. It also recommends a further three year buffer and an allowance for business displacement. Ultimately it identifies a total need for 316.26ha for the plan period. The Local Plan sets this figure as the employment land requirement and seeks to make provision to deliver this.

5. Throughout the examination, the Council has maintained its view that it is not possible or appropriate to establish a direct link between the employment land requirement and jobs growth forecasts. It has also maintained its view that there is not a direct relationship between the employment land and housing requirements.
6. Whilst it is clearly important to take account of past land take up rates, it is necessary to base assessments on a range of data. This is made clear in the PPG¹ which includes reference to data such as employment forecasts and assessments of current and future local labour supply.
7. The Council commissioned employment growth forecasts for the Borough from Oxford Economics and Cambridge Econometrics. These indicate jobs growth for the plan period of 12,319 (Oxford) and 17,391 (Cambridge). The Council's position is that a mid-point between the two forecasts is realistic. This would see 14,855 additional jobs over the plan period.
8. The Local Housing Needs Assessment Update of 2021 – Document H2 (the LHNA) goes on to estimate that some 18,300 additional jobs could be supported by the growth in labour supply as a result of the housing requirement of 816 homes per annum, assuming existing commuting patterns. If the commuting ratio was 1:1 for new jobs, this would fall to approximately 16,100 additional jobs. The Council is committed to the housing requirement of an average of 816 homes per annum and as set out above we consider this to be justified.
9. The figure of 18,300 additional jobs is above even the Cambridge Econometrics forecast which the consultants advising the Council described as “too optimistic” and is significantly above the mid-point considered by the Council as realistic. Therefore assumptions made about the jobs growth that can be supported by the increased labour supply as a result of the housing requirement already build in an element of optimism and additional growth compared with forecasts.
10. In response to our request, the Council provided figures for jobs growth in the Borough that could occur given the provision of employment land on the scale envisaged in the Local Plan. Whilst we acknowledge the misgivings on behalf of the Council in relation to these calculations and the use of such figures, they indicate that in the order of 33,300 total additional jobs could be created in the Borough across all sectors (CD10 and CD10a). Notwithstanding the difficulties of accurately predicting likely jobs growth from the amount of employment land to be provided, the difference between this figure and the 18,300 additional jobs referred to above is very substantial.
11. Amongst other points, the Council relies on analysis (see Table 43 of EDNA) of actual total net jobs growth between 1996 and 2020 and how much employment land theoretical modelling suggests this would have required (70.5ha) compared with actual land take up

¹ Reference ID: 2a-027-20190220

(341.29ha). This analysis does indeed show that actual land take up has been substantially in excess of that which would have been predicted by the modelling exercise and casts some doubt on the use of such modelling to estimate future land requirements. On the other hand it also clearly shows the actual total net jobs growth (48,350) and the actual land take up over the same period (341.29ha). A simple calculation shows that for every 1ha of employment land taken up, there were approximately 142 additional total jobs in the local economy overall.

12. The period between 1996 and 2020 saw some changes in the local economy and in the way businesses operate. Different sectors of the economy have changed to different extents and in different ways. It is likely that such changes will continue over the plan period and the requirements for land and associated job densities will also continue to evolve. The full effects of Brexit and the Covid 19 Pandemic are yet unknown and the current economic situation facing the country further adds to the uncertainty. Despite this uncertainty, the analysis of actual jobs growth and actual land take up over a sustained period (1996-2020) provides a reasonable and perhaps the most robust basis for estimating, in broad terms at least, the potential job growth implications of the employment land requirement. It also provides a basis to estimate the employment land requirement which could be supported by the increased labour supply resulting from the level of housing growth planned.
13. Using the figure of 142 total jobs for each 1ha of employment land, the requirement of 316.26ha could see some 44,900 additional total jobs. Discounting the allowance for business displacement gives a net requirement of 298.62ha which would see some 42,400 additional total jobs. In either case, this would be very significantly in excess of the number of additional jobs that could be supported by the increased labour supply resulting from the level of housing growth planned (18,300).
14. Accurately predicting future economic and jobs growth and the labour supply that will be available is extremely difficult if not impossible, particularly over a whole plan period. We are not suggesting that there needs to be an absolute match between employment land provision, estimated jobs growth and labour supply or that such an absolute match is even possible. However, there needs to be broad alignment, at least, in order for the local economy and housing market to function effectively and to avoid substantial increases in unsustainable commuting patterns. There is a significant disparity between the employment land requirement in the submitted Local Plan and the level of housing proposed. This is in the context of a Local Plan which proposes alterations to the Green Belt to allocate land for employment and housing. The employment land requirement of 316.26ha is not justified therefore.
15. Again, using the figure of 142 total jobs for each 1ha of employment land, the 18,300 additional total jobs which could be supported by the increased labour supply resulting from 816 homes per annum would require some 129ha of employment land over the plan period. Applying a three year buffer as in the EDNA would add another 21.5ha and the allowance for business displacement would add a further 17.64ha. In total approximately 168ha of employment land would be required.
16. To provide some context, we note that the EDNA calculates the land requirements arising from the Oxford and Cambridge forecast models. Even when including only those sectors of the economy forecast to grow, an estimated 62.24ha (Oxford) and 60.12ha (Cambridge) would be required (Table 44 of EDNA columns A+B+C). As a sensitivity analysis, the

EDNA also factors in the significantly more optimistic employment growth from the Strategic Economic Plan. This would result in a total requirement of 107.44ha (Oxford) and 105.07ha (Cambridge).

17. On the basis of the above analysis, an employment land requirement of 168ha would be broadly aligned with the projected increase in labour supply as a result of the housing requirement of 816 homes per annum, taking account of past trends in land take up and associated overall jobs growth. It would be significantly above a requirement derived directly from jobs growth modelling, even when based only on growth sectors and including the additional optimistic growth from the Strategic Economic Plan. Such a requirement would enable the Local Plan to be aspirational and positively prepared. In order for the Local Plan to be justified in this respect, the employment land requirement should be reduced to 168ha.
18. It has been argued by some representors that the housing requirement should be increased to align it more closely with the employment land requirement of 316.26ha. However, a substantial increase in the housing requirement would be needed to provide a sufficient increase in labour supply. This would inevitably involve significant further alterations to the Green Belt, in addition to those already proposed. In itself the average annual housing requirement of 816 homes represents a significant increase when compared with recent trends in completions. Increasing the housing requirement would not be justified and would raise considerable doubts in terms of realistic delivery. Such an approach would not therefore be appropriate.

The supply of employment land

19. The existing supply of employment land in Warrington Borough is 38.86ha. The recently adopted St Helens Local Plan allocates 31.22ha of employment land adjacent to the boundary with Warrington and the existing Omega site. This is specifically to contribute towards Warrington's needs and is the basis of an agreement between the two Councils. Planning permission for employment development on a larger site of 75ha (including the site allocated in the St Helens Local Plan) was granted by the Secretary of State in November 2021. There is currently no agreement between the Councils in relation to this additional consented land contributing to Warrington's employment land needs. However, Warrington Borough Council's view, as set out in the hearing statement for Matter 3 and confirmed at the hearing session, is that the same rationale applies to the larger site i.e. it should all be counted towards Warrington's supply. Whilst at this point in time the additional 44ha cannot be relied upon in calculating Warrington's employment land supply, it provides potential at least for some additional flexibility.
20. As things stand therefore the committed supply of employment land is in the order of 70ha. We set out below our more detailed conclusions on the proposed Main Development Area at Fiddlers Ferry (Policy MD3). However in terms of the allocation of 101ha of land for employment development on the part of the site that is previously developed and not in the Green Belt, we have concluded that this is justified, effective and consistent with national policy. Together with existing commitments, this would provide for a total supply of approximately 171ha. This would be sufficient to meet the requirement of 168ha which as set out above would itself include a three year buffer and an allowance for business displacement.

21. There would be a significant amount of employment land available. Based on the past strategic/local take up of 14.22ha per annum there would be twelve years supply and there would be twenty years supply based on the local take up rate of 8.2ha per annum. There would be adequate time to monitor and review the situation and deal with the issue through a review of the Local Plan. The additional 44ha of land west of Omega in St Helens could potentially add further to the supply.

The South East Warrington Employment Area (Policy MD6)

22. The proposed South East Warrington Employment Area (SEWEA) would involve the removal of some 137ha of land from the Green Belt and its allocation for employment development (B8 and B2 and related ancillary uses).
23. As paragraph 119 of the National Planning Policy Framework (NPPF) states, strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land. Paragraph 140 of the NPPF is clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Paragraph 141 of the NPPF explains that all other reasonable options for meeting the identified need for development should be examined, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries.
24. A key element of the Council's case is that there is an employment land requirement of 316.26ha and that this can't be met without altering the Green Belt and allocating land for development. However, we have concluded that the requirement of 316.26ha is not justified and it should be reduced to 168ha. We have also concluded that the supply of employment land provided by existing commitments and the proposed Fiddlers Ferry Main Development Area would be sufficient to meet this reduced requirement. There is also the potential for additional supply to come from the larger consented site in St Helens. There is no strategic need in quantitative terms to alter the Green Belt and allocate land for employment development at the SEWEA or in Warrington as a whole.
25. Given its location in relation to the junction of the M6 and M56 Motorways and its current greenfield, largely undeveloped nature, the site proposed for the SEWEA is clearly attractive to the development industry, particularly with respect to the logistics sector. There is strong interest in progressing proposals for the site and it would be likely to come forward for development relatively quickly. In itself the SEWEA would be likely to provide for a substantial number of jobs and have significant benefits for the economy.
26. However, as noted above there would be a sufficient supply of employment land without it. The allocation at Fiddlers Ferry and existing commitments would provide a range of sites in different locations across the Borough, including for B8 uses. The employment land element of the Fiddlers Ferry allocation would involve the redevelopment of the former coal fired power station and associated previously developed land. Bringing forward the Fiddlers Ferry site for employment development clearly has significant challenges in relation to the demolition and clearance of existing buildings and structures, remediation works and the overall viability of the proposals. It is also not as well placed as the SEWEA in relation to the motorway network. However, the site is being actively promoted for redevelopment and some progress has been made in terms of bringing forward proposals. The Council's position is that the employment land element of the Fiddlers Ferry allocation is viable and

deliverable (subject to cross subsidy from housing) and that it has potential to accommodate large scale and strategic development, including for logistics. As set out below and subject to our detailed conclusions on the Fiddlers Ferry allocation, we share this view. In terms of the range and type of employment land that would be available, there is no strategic need for the SEWEA therefore.

27. The site for the proposed SEWEA is located immediately to the east of the Appleton Thorn Trading Estate, Barleycastle Trading Estate and Stretton Green Distribution Park which are inset within (excluded from) the Green Belt. However, it is separated from the urban area of Warrington by significant areas of open countryside which are also within the Green Belt. In terms of the purposes of the Green Belt, the primary role of the site in its current form is to assist in safeguarding the countryside from encroachment. The site is bounded to the south by the M56, the east by the M6 and the north by the B5356 and so the allocation could create strong, permanent Green Belt boundaries. Nonetheless, the scale and extent of the site and the development proposed on it would involve a substantial incursion into largely undeveloped and open countryside. It would represent significant encroachment into the countryside.
28. The information within the Masterplan Development Framework is illustrative at this stage, though it sets out the broad parameters for the comprehensive development of the area for large scale distribution, logistics, industrial uses and ancillary offices. The site is largely flat with limited internal and boundary vegetation, and therefore has a high degree of openness. Such visual openness would be lost to development on a considerable scale, accommodating very large buildings and associated vehicles. The visual harm to the openness of the Green Belt would be severe.
29. Considering the landscape and visual impacts of the allocation more broadly, the overriding character of this area is as part of Warrington's rural hinterland. This is somewhat undermined by the existing warehouse and industrial developments to the west, and the motorways to the south and east. However, the scale and form of the development proposed would be transformative in nature, substantially expanding the industrial character of the adjacent area. Furthermore, the site is located on part of the highest land in the Borough, which then gradually descends northwards towards a central band of low lying, reasonably level land. Whilst tree planting could assist with mitigating visual impacts, it is likely that development on the scale proposed would cause substantial visual intrusion, particularly when viewed from roads and public rights of way to the north. It would have a significant adverse effect on the character and appearance of the area.
30. To conclude on this issue, there is no strategic need for the SEWEA allocation in terms of the need for employment land or the range and type of employment land that would be available. It would result in a significant encroachment into the countryside, undermining one of the purposes of the Green Belt and would cause severe harm to the openness of the Green Belt. It would also have a significant adverse effect on the character and appearance of the area. Whilst there would be economic benefits as a result of the allocation, these do not outweigh the above concerns. Exceptional circumstances to alter the Green Belt in this case do not exist. In order for the Local Plan to be justified and consistent with national policy the proposed SEWEA and Policy MD6 should be deleted therefore.

Fiddlers Ferry Main Development Area (Policy MD3)

31. The Fiddlers Ferry Main Development Area encompasses the former power station site and adjoining land including to the south beyond the St Helens Canal and railway line to the River Mersey. The allocation envisages two distinct phases. The first phase relates to the former power station and the opportunity this provides for new employment uses. This phase would also involve land currently in the Green Belt to the east of the former power station for a minimum of 860 homes. The Council's viability evidence demonstrates that this phase one residential development is required to cross-subsidise the demolition and remediation costs of developing the former power station land for employment purposes.
32. Phase one would involve the removal of much of parcel WR79, from the Green Belt. This is assessed as making a strong contribution to Green Belt purposes. It is also possible that the arable fields and woodland comprising this parcel provide habitat for the Mersey Estuary Special Protection Area (SPA) / Ramsar species, the implications of which are considered further below. However, there is a need to ensure an adequate supply of housing and employment land in the Borough and phase one would make an important and necessary contribution to both. As noted above the release of Green Belt land for the housing element of phase one is necessary for the viability of the employment element of the allocation which would utilise previously developed land and avoid the need for Green Belt release elsewhere for employment land. Together these factors provide the exceptional circumstances necessary to justify altering the Green Belt in this case.
33. The southern part of the allocation site is intended to be developed in phase two. This part of the site is currently all within the Green Belt. It is proposed to alter the Green Belt to remove the land proposed for housing. The land in question was assessed as making a moderate contribution to Green Belt purposes. This was based in part on the assessment that it makes 'no' contribution to purpose 1, to check the unrestricted sprawl of large built-up areas given that it is not adjacent to the Warrington urban area. However, it appears that its relationship with the built-up area of Widnes was not considered. It was nonetheless recognised that this parcel of land makes a strong contribution to purpose 2, preventing neighbouring towns from merging into one another, as it forms part of an essential gap between Warrington, Widnes and Runcorn. As such the phase two development would erode this gap. It would also represent a substantial encroachment into the countryside and it would have a significant effect on the openness of the Green Belt.
34. This southern part of the allocation also encompasses, and lies adjacent to, areas of particular environmental sensitivity. It incorporates part of the Upper Mersey Estuary Local Wildlife Site (LWS) and the St Helens Canal (disused) LWS. It is also adjacent to the Widnes Warth Saltmarsh LWS and the Upper Mersey Estuary Intertidal Areas and Mudflats LWS. Whilst various ecological surveys and impact assessments have been undertaken (CD31), some of this is dated, and the more recent surveys relate to the phase one area only. There are therefore likely to be significant biodiversity implications associated with the southern part of the allocation which have not been fully evaluated.
35. The LWS, and the areas of saltmarsh and mudflats near the southern boundary of the site, are around 5km from the Mersey Estuary SPA and Ramsar at the closest point. The updated Habitats Regulations Assessment (HRA) (SP12) notes that all qualifying species of wintering birds have been recorded in the tetrad encompassing the allocation (para 4.6). A Preliminary Ecological Appraisal undertaken in January 2021 also confirmed the presence

of various habitats on site, including unimproved neutral grassland, swamp, standing water, saltmarsh and arable fields. It concluded that the site has potential functional linkage to the SPA / Ramsar. On this basis the updated HRA sets out that further wintering bird data is required as part of the policy requirement for the allocation (para 4.6).

36. Updated information provided to the Examination indicates that wintering bird surveys are being undertaken during the 2022/2023 winter period and are proposed for the 2023/2024 season (CD31). In this regard there is therefore some uncertainty around the habitat implications of the allocation as a whole. It may prove necessary to plan for avoidance measures and mitigation in respect of the effects of the first phase of development, including the possibility that land within the phase two allocation could be used for such purposes.
37. In contrast with phase one, the phase two housing development would not be required to cross subsidise the development of the employment land. Whilst it is only necessary to demonstrate that the phase two allocation is developable, the Council's viability evidence suggests that the delivery of this could be challenging, with the potential requirement for a new bridge across the railway and canal. On this basis it is suggested that any surplus generated from phase one could potentially be utilised as cross-subsidy to contribute towards enabling the delivery of phase two (para 8.33, V2).
38. As currently envisaged, the phase one residential development for a minimum of 860 would also deliver a single form entry primary school. In this regard there would be a basic level of local service provision, along with the adjacent employment opportunities.
39. The housing proposed across the two phases would amount to a minimum of 1,760 dwellings. On this basis it is suggested that this would provide a 'critical mass' which would facilitate infrastructure delivery and the provision of supporting infrastructure to help realise the ambition of creating a sustainable new community. However, even if all 1,760 homes were constructed, it is doubtful whether this volume of housing would be sufficient to support a stand-alone community. Furthermore, given the close proximity of the new residential development to the urban areas of Widnes and Warrington, it is likely that residents of this area would draw on the wider range of facilities and services in this broad and reasonably accessible hinterland.
40. We set out our conclusion in relation to the overall supply of housing land below, however there would be an adequate supply without the southern part of the Fiddlers Ferry allocation. It is not required to cross subsidise the employment development on phase one, it would undermine the purposes of the Green Belt and there are concerns in relation to the impact on biodiversity and habitats. In light of this, we conclude that there are not exceptional circumstances to alter the Green Belt in the case of the southern part of the Fiddlers Ferry Main Development Area. In order for the Local Plan to be justified and consistent with national policy, the boundary of the allocation should be amended to remove the land south of the canal and railway line. This land should remain in the Green Belt and Policy MD3 should be amended accordingly.

Warrington Waterfront (Policy MD1)

41. The Warrington Waterfront Main Development Area is well located in relation to the urban area and town centre. Whilst it is a green field site, the vast majority of the site is not in the

Green Belt². It could potentially make a significant contribution to housing provision and reduce the need for Green Belt alterations elsewhere in the Borough. In principle the allocation of the site is justified. However, the development of the site is wholly reliant on the proposed Warrington Western Link Road as it is not otherwise accessible. The Council fully acknowledges this and indeed the Local Plan makes this clear.

42. The cost of the Western Link had previously been estimated at £212.7m. A conditional offer of a maximum capped £142.5m funding contribution was received from the Department for Transport in April 2019. The Council had made a commitment to fund the remaining £70.2m in November 2017 and again in July 2019.
43. The context for the Western Link has changed significantly since then however. The previous proposed submission version of the Local Plan (PVL1) published in April 2019 included a substantially larger Warrington Waterfront allocation incorporating two areas of employment land. Additionally it included a south west urban extension of around 1,600 homes which would also have been reliant on the Western Link. In both cases, contributions towards the western link would have been required. These proposals were not carried forward to the submitted Local Plan and the scale of development proposed in this part of Warrington is now much less.
44. Crucially the estimated cost of the scheme has now increased by some £57m to approximately £269m. The previous commitments to funding are now dated and as noted above, the context for the scheme has changed significantly. We are not aware of any recent commitments to funding from either the Department for Transport or the Council in the light of the current proposals in the submitted Local Plan and the estimated increased overall cost. In any case, even if those commitments still stand, there is a very substantial shortfall in funding of some £57m. Whilst we appreciate that the Council remains committed to the Western Link and is exploring possible sources of additional funding, there is insufficient basis to conclude that such funding will be secured or that there is even a realistic prospect of it being secured. This puts the delivery of the Western Link in serious doubt.
45. Therefore on the basis of the evidence currently available, we consider that the Warrington Waterfront Main Development Area is not developable within the plan period. However, as we have said, the principle of the allocation is justified. It may be that funding for the Western Link can be secured at some point, facilitating the development of the Warrington Waterfront site. In light of this the allocation and Policy MD1 should remain in the Local Plan (subject to detailed modifications). This would retain the potential for housing development to come forward and may assist in securing funding for the Western Link. However, the housing trajectory and the calculation of the supply of housing land should not factor in any completions from the site, given the degree of uncertainty that exists. The Local Plan should be modified to explain this clearly.

Other key issues

46. With respect to the other Main Development Areas and site allocations not referred to above, we have concluded that in principle they are justified and should remain in the Local

² Noting that a very small area of Green Belt land would be required to facilitate development of the site.

Plan. There will be a need for detailed main modifications however to ensure that the relevant policies are effective.

47. The Council's most up to date position regarding the housing trajectory and housing land supply is set out in document CD53. This estimates a total supply for the plan period of 16,405 homes (or 16,977 if additional small sites under 0.25ha but with more than 5 units are included). Our conclusions on the Main Development Areas at Fiddlers Ferry and Warrington Waterfront would reduce this supply by 450 and 990 respectively. Even so, there would still be an adequate supply compared with the overall requirement of 14,688 homes. We consider that it is reasonable to also include some allowance for additional small sites under 0.25ha but with more than 5 units. The supply of housing land relies significantly on urban capacity and SHLAA sites. Realistically, it is likely that not all of this potential supply will actually come forward or that there will be delays in timescales. However, there would be some flexibility in the supply compared with requirements. The Council is also committed to monitoring housing delivery and considering a review of the Local Plan if necessary. We are satisfied that there is likely to be a five year supply of housing land on adoption of the Local Plan.
48. We would like to draw your attention to the recent Court of Appeal judgement regarding the interpretation of the Planning Policy for Traveller Sites and the application of that policy to Gypsies and Travellers who have ceased to pursue nomadic lifestyles (Lisa Smith v SSLUHC [2022] EWCA Civ 1391). In light of that judgement, we would be grateful for your views as to the implications for the assessment of accommodation needs and the Local Plan's approach to meeting such needs.

Next steps

49. We appreciate that our conclusions in relation to the employment land requirement, the SEWEA, Fiddlers Ferry and Warrington Waterfront have significant implications. However, the Local Plan process can now proceed to the main modifications stage, there is no need for any substantial additional work, and no need to identify alternative site allocations. We would be grateful if you can confirm that the Council wishes to proceed towards public consultation on a schedule of main modifications.
50. In addition to the main modifications that are required to address the key issues set out above, there will need to be a number of other main modifications, dealing with a range of policies throughout the Local Plan. It is our intention to inform the Council of these once we have clarified the way forward. The schedule of main modifications would need to be available for public consultation for at least six weeks and subject to sustainability appraisal and potentially also Habitats Regulations Assessment.
51. A copy of this letter should be placed on the examination webpage as soon as possible. We look forward to your response.

Yours sincerely,

Andrea Mageean and Kevin Ward

INSPECTORS