

Proposed Submission  
Version Local Plan:  
Responding to  
Representations Report

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2019

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## **Introduction**

### **1. Purpose of the Report**

- 1.1 This report has been prepared in order to summarise the consultation process which has informed the preparation of the Local Plan to date and to demonstrate how all the responses received have been taken into account in the preparation of the Proposed Submission Version Local Plan.
- 1.2 This report relates to the consultation carried out in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

## **Consultation to date**

### **2. Scope and Call for Sites 2016 Consultation (Regulation 18 Part 1)**

- 2.1 Following the High Court ruling in February 2015 which quashed the housing target in the adopted Local Plan Core Strategy (2014), the Council sought to update its housing policies. It became clear that the Borough's needs going forward could not be met without a full review of the adopted plan.
- 2.2 In October 2016, Executive Board agreed to commence the process of reviewing the existing Warrington Local Plan. The Council subsequently undertook a 6 week period of consultation on the scope of the review and the Council's assessment of Warrington's development needs. The Council also invited developers, landowners, the local community and other stakeholders to submit sites they wanted to be considered as part of the Plan review.
- 2.3 Notification of the consultation was made on the Council's web site and in the local press. In addition, all contacts on the Council's Local Plan mailing list were contacted by email. This is in accordance with the Council's Statement of Community Involvement (2014) and the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.4 At this consultation stage the Council received a total of 78 responses together with 155 sites submitted under the 'call for sites'.

### **3. Preferred Development Option Consultation (Regulation 18 Part 2)**

- 3.1 Following the consultation the Council undertook the work necessary to progress to a Preferred Development Option (PDO) for accommodating Warrington's development needs. This work included:
- Updating the assessment of need for additional homes and jobs in the context of consultation responses and more recent socio-economic data;

- Carrying out a more detailed assessment of the capacity of the existing urban area to accommodate additional development, including the capacity of existing infrastructure;
- Revising the existing Plan's Strategic Objectives to retain the focus on regenerating the town centre and Inner Warrington, whilst recognising the need to accommodate additional growth and release land currently in the Green Belt;
- Assessing different options for the release of Green Belt to accommodate additional growth across the borough, including identification of the additional infrastructure that will be required; and
- Confirming the preferred main locations for development, including the main locations for Green Belt release.

3.2 Consultation on the PDO was carried out between 18th July and 29th September 2017. Notification of the consultation was made on the Council's web site, in the local press and on local radio. The consultation was also publicised in the 'Wire' – the Council's e-bulletin which was received by over 4,000 people. In addition, all contacts on the Council's Local Plan mailing list were contacted by email. This is in accordance with the Council's Statement of Community Involvement (2014) and the Town and Country Planning (Local Planning) (England) Regulations 2012.

3.3 Events were held across the Borough comprising drop in sessions with staff on hand to answer questions and discuss the content of the PDO. Drop in sessions were held between July and September 2017 in the following locations:

- Winwick Leisure Centre, July 2017 – afternoon/evening event
- Bridgewater High School (Lower Hall Site), July 2017 - afternoon/evening event
- The Village Hotel, August 2017 - afternoon/evening event
- Birchwood Leisure Centre, August 2017 - afternoon/evening event
- Penketh High School, August 2017 - afternoon/evening event
- Culcheth Library, August 2017 - afternoon/evening event
- Lymm Village Hall, August 2017 - afternoon/evening event
- Burtonwood Catholic Club, August 2017 and September 2017 - afternoon/evening event
- Park Royal Hotel, Stretton, September 2017 - afternoon/evening event
- Pyramid Centre, September 2017 - afternoon/evening event

3.4 The Council also prepared a YouTube video to summarise how the PDO was prepared and its key proposals. This was posted on the Council's web site and played at each of the consultation events.

3.5 Around 4,500 responses were received to the PDO consultation. These have all been considered in the preparation of this Proposed Submission Version Local Plan. A petition was also submitted objecting to the proposals in the Preferred Development Option which was signed by over 4,000 people.

3.6 We have analysed data of the responses submitted via the Council's online survey from which we have been able to extract a snapshot of the nature of respondents from questions relating to the Council's equalities monitoring process. Whilst we recognise that this does

not account for all respondents, it is useful to identify some of the key characteristics of respondents which are as follows:

- 48% of respondents were male, 52% were female. (From 1,403 responses)
- The highest proportion (27%) of respondents were in the age bracket 45 to 54 years. 23% were aged 35 to 44 and 20% of respondents were aged 55 to 64 years. Only 1% were aged 16 to 24 and 8% aged 25 to 34. (From 1,388 responses)
- 98% of respondents were 'White' and 'British'. (From 1,308 responses)

5.2 The Council is aware that response levels from certain groups – in particular younger people and people from Black and Minority Ethnic Groups - were low. This is despite specific efforts being made to target 'hard to reach groups' within the community. Further efforts will be made during the consultation on the Proposed Submission Version Local Plan to maximise responses from all, including 'hard to reach groups'. This issue is also addressed in the Council's Equalities Impact Assessment (EqIA) prepared in support of the Proposed Submission Version Local Plan.

## **Analysing the Responses**

### **4. Process**

- 4.1 Given the large number of responses received in relation to the PDO document, the Council adopted a thorough methodology to ensure that all responses were captured and fully considered. This involved breaking down the comments received into themes, based on the PDO document and the questions in the standard response form (these are included in Figure 6.1). Each individual representation was given a PDO number, details of the person making the comments were logged and their comments were then broken down under the relevant themes on a spreadsheet.
- 4.2 A full version of the spreadsheet has been published with the Proposed Submission Version Local Plan.
- 4.3 Due to the number of responses received at the PDO stage and the fact that many of the responses raised similar issues, the Council has extracted the issues under each theme in order to analyse the issue, consider any actions required and to confirm the Council's response on how each issue has been taken into account.
- 4.4 The themes by which the representations to the PDO stage were analysed were also applied to the representations received at the earlier scoping stage in 2016, allowing all Regulation 18 representations to be reconsidered together in this analysis.
- 4.5 Using this approach, the Council has been able to extract and respond to all issues raised and explain exactly how these have been taken into account in preparing the Proposed Submission Version Local Plan.

4.6 The remainder of this report firstly summarises the headline issues from the PDO consultation and then sets out all of the issues raised by theme and the Council's response to them.

## 5. **Headline Issues**

5.1 A summary of the headline issues raised during the Regulation 18 consultation is provided below.

5.2 How we consulted:

- Widespread belief from the public that we should have publicised the consultation more effectively.
- Criticism of the timing of the consultation over summer holiday period.
- Criticism we didn't consult more widely on the scale of growth before progressing to a preferred option.

5.3 Scale of growth proposed:

- Widespread public concern about level of growth proposed:
  - Objection to concept of Warrington becoming a 'city'.
  - Planning for more homes than the minimum the Council is required to.
  - Questioning the robustness of jobs forecasts in context of Brexit.
  - 20 year plan period considered too long given economic uncertainties.
  - Objection to proposal to safeguard land beyond the Plan period
- Developers generally supportive of the housing target and amount of employment land as a minimum requirement but a number considered level of safeguarding provision to be insufficient.

5.4 Assessment of the existing urban area to accommodate new development:

- Developers objecting to some of the additional urban capacity identified in city centre / waterfront masterplans on the basis that the Council cannot demonstrate they will be developed in the Plan Period.
- A large number of public representations considered that the redevelopment of Fiddlers Ferry should be included in the Local Plan in order to reduce amount of required Green Belt release.
- A large number of public representations considered that residential densities should be increased to reduce the amount of required Green Belt release.
- A large number of public representations objected to Peel Hall being included as part of the identified urban capacity.

5.5 Impacts of scale of growth proposed:

- Widespread public concern about increase in traffic and impact on air quality.
- Concern over the environmental impacts of loss of countryside.

- Concern about impact on social infrastructure, in particular schools, GPs and Warrington Hospital.
- Public and some developers expressed concern about the ability to deliver the scale of infrastructure required to support growth.
- Halton and St Helens Councils concerned that Warrington's proposed growth could impact on their own growth ambitions.

5.6 Proposed distribution of new development:

- A number of developers pushing for more growth in the settlements arguing the Plan is too reliant on major urban extensions in the south.
- Concern over distribution of Green Belt release from residents and Parish Councils in the south.
- Criticism from public and qualified concern from Highways England that we have undertaken options assessment prior to detailed transport modelling.

5.7 Proposal for a Garden City Suburb:

- Widespread public and Parish Council concerns over scale of development in this location, loss of Green Belt / countryside and impact on character of the area.
- Public and Highways England concerns over impact of traffic congestion
- Major public concerns over proposal to re-use disused railway line to provide a crossing over the ship canal.
- Public sceptical that new homes will be affordable for local residents.
- Developers promoting land within the area questioning phasing of development with concern that it may unnecessarily hold development back.
- Developers promoting sites elsewhere questioning deliverability of infrastructure and stating that the assumed build rates are not achievable.

5.8 Proposals for South West Extension / and Warrington Waterfront (including Port Warrington):

- Widespread public and Parish Council concerns over scale of growth in this location, loss of Green Belt / countryside and impact on character.
- Public, Parish Councils and Halton Council concerned with loss of Green Belt separating Warrington from Halton.
- Public, Parish Councils, local nature groups and Halton Council concerned about impact of expanded Port Warrington on function of Green Belt, impact on Moore nature reserve and potential highways impacts.

## 6. Detailed Issues and Responses

6.1 This sections provides a detailed breakdown of the issues raised during the Scope and Contents and PDO consultations by 'theme'. For each 'theme' the following is provided:

- a summary of the number of responses received at each stage of consultation;

- an overview of the issues raised in the responses;
- a summary of each of the individual issues for that theme; and
- the Council’s response to each of the individual issues.

6.2 Some themes have been combined where the issues raised are very similar. For ease of reference back to the response log spreadsheet, those themes which have been combined are summarised in Figure 6.1 below.

Figure 6.1 – Grouping of Themes

<b>Report Themes</b>	<b>Themes (as in the Council’s response log)</b>
1. Warrington’s need for new homes	Housing requirement, methodology/SHMA, affordable housing need, tenure and mix of housing.
2. Implications of Brexit	Brexit
3. Local Plan Jobs Growth	Uplift in jobs
4. Warrington’s need for employment land	Types of jobs being promoted, land requirements for employment, employment sites, Imbalance of land and job numbers
5. Other Development Needs	Other Development Needs.
6. Plan Period	Plan Period.
7. Capacity of the existing urban area to accommodate new development	Urban Capacity General.
8. Land Supply to meet Warrington’s development needs	Land Supply, flexibility factor, backlog.
9. Use of Masterplans	Use of Masterplans.
10. Build rates and delivery assumptions	Build rate and delivery assumptions.
11. Future of Fiddlers Ferry Power Station	Fiddlers Ferry.
12. Safeguarded Land	Safeguarding.
13. Vision and Objectives	Vision and Objectives, need for growth.
14. Green Belt Assessment	Green Belt, methodology, application in options assessment, link with GB assessment.
15. Exceptional Circumstances for Green Belt release	Exceptional Circumstances.
16. Spatial Options Process and Outcome	Spatial Options Process, General Technical Spatial Options Paper, Site Selection Process.
17. Main Area Profiles and Settlement Profiles	Main Area Profiles, Settlement Profiles.
18. Social Infrastructure/Health	Social Infrastructure/Health
19. Warrington’s Hospital	Hospital
20. Accessibility, Transport and Infrastructure	Accessibility/Transport/Infrastructure
21. Ship Canal Crossing	Ship Canal Crossing
22. Western Link	Western Link
23. Scale of Development in South Warrington	Sustainability South Warrington
24. Air Quality	Air Quality
25. Flood Risk	Flooding
26. Education and Skills	Education and Skills



27. Neighbourhood Plans	Neighbourhood Plans
28. Sustainability Appraisal / Strategic Environmental Assessment	SA/SEA
29. Views from residents on specific sites submitted under the 'Call for Sites'	Views on sites from residents
30. Warrington Town Centre development proposals	City Centre, Main Development Areas
31. Waterfront development proposals	Waterfront, Main Development Areas
32. Wider Urban Area development proposals	Wider Urban Area
33. Garden Suburb development proposals	Garden Suburb, Main Development Areas
34. Port Warrington development proposals	Port Warrington, Main Development Areas
35. South West Extension development proposals	South West Extension, Main Development Areas
36. Outlying Settlements development proposals	Outlying Settlements, Main Development Areas
37. Meeting the Needs of Gypsy & Travellers	Gypsy and Traveller
38. Minerals and Waste	Minerals and Waste
39. Any Other Issues	Anything Else should be included in the Local Plan?

6.2 It should be noted that the themes below are not considered in order of importance but in the order they appeared in the Council's PDO document, and the subsequent spreadsheet of representations.

6.3 Respondent types have been grouped into the following categories:

- Residents;
- Elected representatives;
- Developers/agents;
- Neighbouring Councils; and
- Other stakeholders.

## Theme 1: Warrington’s need for new homes

No of responses Part 1	59
No of responses Part 2	2240
<b>Total</b>	<b>2299</b>

### Overview

There was a significant level of response in relation to housing needs from all categories of respondent given how fundamental this issue is to the preparation of the Local Plan.

### Key Issues

Respondents generally commented on the housing requirement, the methodology used in the Strategic Housing Market Assessment (2017) which informed the Preferred Development Option, affordable housing need and/or tenure and mix of housing.

Of the submissions from developers, landowners and agents, they were generally supportive of the housing requirement identified, with some also pushing for a higher figure to reflect past trends in jobs growth or to ensure a sufficient amount of affordable housing is provided.

Responses from the community generally objected to the scale of housing identified during the plan period and raised the issue that projections should be considered in a post-Brexit world.

### Conclusion

Having considered all the representations received, and having regard to the various changes at the national level which have come into force since the PDO consultation, the Council has re-calculated its housing requirement. The most notable change since the PDO consultation has been the emergence of the Standard Methodology to calculate housing need which is to be applied nationwide. Over the course of the preparation of the draft Local Plan, the inputs to the Standard Methodology have evolved with the latest consultation taking place in December 2018, and confirmed in February 2019. For Warrington, the Standard Methodology calculation now generates a figure of 909 dwellings per annum. This is using the latest government formula which uses the 2014-based household projections and is the Government’s minimum requirement.

Through its Local Housing Needs Assessment (2019), the Council has identified an appropriate uplift to the Standard Methodology to ensure enough homes are provided to support the number of jobs that will be created from Warrington’s future economic growth and to address current issues of affordability. Government guidance is clear that if the Council can demonstrate that an alternative approach identifies a higher housing need, the approach should be considered sound as it will have exceeded the minimum starting point. Warrington’s housing target is around 4% higher than the standard methodology figure, at 945 dwellings per annum.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 1.

Table 1: Warrington’s need for new homes - Issues and Responses

Issue	Respondent Type	Council Response
<p>Target of 1,113 dpa is insufficient to support the level of job growth (it should be 1,332 dpa based on past trends).</p>	<p>Developers/agents</p>	<p>The proposed Local Plan Housing target reflects the Council’s growth aspirations and its commitment to address the increasing problem of affordability of housing, particularly for Warrington’s younger people and young families. The proposed target has however been reduced from 1,113 to 945 homes per annum, reflecting lower economic growth forecasts following the EU referendum.</p> <p>The proposed target is around 4% above the minimum housing requirement under the Government’s Standard Housing Methodology – 909 homes per annum (based on 2014 household projections).</p> <p>The target of 945 homes per annum is consistent with Planning Practice Guidance which confirms the government is supportive of ambitious authorities who want to plan for growth and that higher housing levels are appropriate where a growth strategy is in place (PPG: Housing need assessment - paragraph 10).</p> <p>Basing the requirement on past employment trends is not considered to be robust as Warrington has experienced unprecedented levels of growth in recent years, partly as a legacy from its New Town status.</p>
<p>The Council is moving towards a situation of ‘persistent under delivery’ based upon the three most recent monitoring years and therefore a 20% buffer should be applied.</p>	<p>Developers/agents</p>	<p>The standard housing methodology takes account of historic back log. The Local Plan housing target is in excess of the minimum requirement under the standard housing methodology and therefore any historic under delivery will be addressed in the Local Plan.</p>
<p>The housing requirement has been overestimated based on the New City aspirations.</p>	<p>Residents, elected representatives, developers/agents</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the draft Local Plan post-dates the EU Referendum decision.</p>

		The downward revision of forecast jobs growth has resulted in a consequential reduction in the proposed Local Plan Housing target from 1,113 homes per annum to 945 homes per annum.
Affordability ratio has worsened justifying an amendment to projections.	Developers/agents	The Local Housing Needs Assessment (2019) has taken the latest affordability data published in 2018 by ONS into account.
Static commuting rate and household formation rates are challenged.	Developers/agents	This has been addressed in the Local Housing Needs Assessment (2019) and figures have been updated. The commuting rate is held constant in the assessment to ensure that a 'policy-off' approach has been taken and to ensure consistency of methodology with neighbouring boroughs.
Forecasts need to be based upon the latest available demographic/economic data.	Residents, elected representatives, developers/agents	Demographic and economic data has been updated over the course of 2018/2019 in order that Draft Local Plan policies are based on the latest evidence at the time of writing.
Warrington is a self-contained housing market area and should be considered as such.	Developers/agents	The Local Housing Needs Assessment (2019) assesses the housing market in Warrington in the context of the Mid-Mersey housing market, albeit that the housing market in Warrington is also considered in its own right.
OBR data should be used rather than Experian data.	Developers/agents	To ensure consistency with the other Councils in the Mid-Mersey Housing Market Area, OBR data has not been used.
The SHMA should identify localised affordable housing need.	Developers/agents, elected representatives	Affordable housing needs have been fully assessed at a local level and are reflected in the draft Housing Needs policy (Policy DEV2).
Affordable housing need is too low – the very lowest housing requirement to ensure that affordable housing need is addressed is 1,152dpa.	Developers/agents	Since publication of the PDO, Warrington's housing need has increased to 377 dwellings per annum. Councils can consider uplifting their housing target in order to address affordable housing need, however it is considered to be oversimplifying the issue to merely increase the overall housing target to ensure that 377 affordable units are delivered per annum. This issue is addressed in more detail in the Local Housing Needs Assessment (2019) and in the Council's Local Plan supporting technical report. In addition, the Council is already proposing to uplift the housing target above the baseline figure, as

		detailed above.
There is an error in the calculation of annual 'net need' for affordable housing (the increase from 230 to 288 has not been taken into account).	Developers/agents	Affordable housing need has been updated in the Local Housing Needs Assessment (2019).
Delivery rates – concern regarding the delivery rates proposed being overly optimistic and highlight a need to break these down further for different site sizes. Reference made to the Lichfields research 2016.	Developers/agents	<p>A detailed review of delivery rates has been undertaken, particularly in the development of the concept masterplans for the major new development sites. The work has been informed by studies on delivery rates, the Council's own experience and data/experience from Homes England. This work has been reflected in the Council's updated development trajectory.</p> <p>For the Garden Suburb in particular, this work has resulted in a reduced number of homes being delivered over the plan period.</p>
No reference to provision of older persons accommodation	Residents, elected representatives, developers/agents	The Housing Needs policy (Policy DEV2), informed by the Local Housing Needs Assessment (2019) makes reference to the need to provide for an aging population, as do the area specific policies/allocations.
There should be more development in the settlements to address affordable housing need here.	Residents, developers/agents	The level of development attributed to the settlements has been informed by the spatial options assessment process which used a range of information sources in relation to current services, affordability issues, sustainability, Green Belt assessment etc. It is considered that the amount of development attributed to the settlements is appropriate in the context of the wider Draft Local Plan strategy. In accordance with the findings of the Local Housing Needs Assessment (2019) and the Draft Local Plan Viability Assessment (2019), Policy DEV2 seeks a minimum of 30% affordable housing in the settlements.
It is misleading of the Council to let the public believe that the volume of housing required is something set by the Government when it is WBC who has calculated the volume requirement.	Residents	<p>There have been significant changes to how the Council is required to calculate its housing need since the PDO consultation.</p> <p>Since then the Government has introduced a requirement to determine the minimum number of homes needed, through a Local Housing Need Assessment</p>

		<p>(LHNA), using the standard methodology outlined in national planning guidance (Paragraph 60 of the NPPF).</p> <p>The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Hence, there is scope with the guidance to provide an uplift in certain circumstances, such as where additional growth above historic trends is likely to or is planned to occur over the plan period.</p>
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## Theme 2: Implications of Brexit

No of responses Part 1	0
No of responses Part 2	359
<b>Total</b>	<b>359</b>

### Overview

A relatively large proportion of residents together with Borough Councillors, Parish Councillors and Parish Councils raised the issue of Brexit and the potential implications for the Local Plan. Brexit was not an issue raised by Developers, landowners and agents.

### Key Issues

The responses related to concerns over the uncertainty generated by Brexit and the potential impact on economic and demographic projections. As a consequence respondents considered that the housing target and employment land requirement set out in the PDO was too high and that a 20 year plan was too long given economic uncertainties arising from Brexit.

### Conclusions

Having considered the representations, the Council has undertaken a comprehensive review of its housing and employment needs evidence base, using updated forecast and projection data. The downward revision of forecast jobs growth has resulted in a consequential reduction in the proposed Local Plan Housing target from 1,113 homes per annum to 945 homes per annum.

It is acknowledged that the final terms of the UK leaving the EU are not known and therefore it will be important to keep the Plan under review.

This section focusses on the issue of Brexit. The Council has provided a more detailed response to representations on the proposed Plan Period and proposed housing target elsewhere in this report.

A summary of all issues under this theme and the Council's response to them are set out below in Table 2.

Table 2: Implications of Brexit - Issues and Responses

Issue	Respondent Type	Council Response
The Council's housing and employment forecasts pre-date the EU referendum decision. This evidence should therefore be re-assessed.	Residents, elected representatives	The Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the draft Local Plan post-dates the EU Referendum decision.
Given the uncertainty of Brexit the Plan period should be reduced to 15 years with a review after 5 years.	Residents, elected representatives	The new NPPF (2019) requires that strategic policies look ahead over a minimum of 15 years from the date of adoption of the Local Plan. The proposed plan period of 2017 to 2037 meets this requirement on the assumption that the

		<p>Plan is adopted in 2020, in accordance with the timetable in the Local Development Scheme (LDS).</p> <p>The Plan will be kept under regular review to ensure that it is able to respond to changes in circumstances</p>
<p>Brexit will have a negative impact on economic growth and will reduce immigration therefore the need for new homes will decrease.</p>	<p>Residents, elected representatives</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the draft Local Plan post-dates the EU Referendum decision.</p> <p>The downward revision of forecast jobs growth has resulted in a consequential reduction in the proposed Local Plan Housing target from 1,113 homes per annum to 945 homes per annum.</p>
<p>Given the uncertainties of Brexit, the Plan should only plan for the minimum number of homes under the Government's new housing methodology.</p>	<p>Residents, elected representatives</p>	<p>The proposed Local Plan Housing target reflects the Council's growth aspirations and its commitment to address the increasing problem of affordability of housing, particularly for Warrington's younger people and young families. The proposed target has however been reduced from 1,113 to 945 homes per annum, reflecting lower economic growth forecasts following the EU referendum.</p> <p>The proposed target is around 4% above the minimum housing requirement under the Government's Standard Housing Methodology – 909 homes per annum (based on 2014 household projections).</p> <p>The target of 945 homes per annum is consistent with Planning Practice Guidance which confirms the government is supportive of ambitious authorities who want to plan for growth and that higher housing levels are appropriate where a growth strategy is in place (PPG: Housing need assessment - paragraph 10).</p>
<p>Brexit will have a negative impact on economic growth and the amount of employment land required will therefore</p>	<p>Residents, elected representatives</p>	<p>The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2019) using data which post-dates the EU</p>



decrease.		referendum. The Council is therefore confident the amount of land being proposed for employment in the Local Plan is robust.
The Plan will result in a loss of agricultural land which will become more important following Brexit with the need for the UK to produce more of its own food.	Residents, elected representatives	The Plan will result in the loss of agricultural land, but the vast majority of land in the borough currently in active agricultural use, or with the potential for agricultural use, will be protected. The value of agricultural land was a consideration in the options assessment and sustainability appraisal process.

### Theme 3: Local Plan Jobs Growth

No of responses Part 1	18
No of responses Part 2	71
<b>Total</b>	<b>89</b>

#### Overview

A large number of respondents across all categories raised the issue of how the Council has calculated the number of jobs forecast to be delivered in the Plan period.

#### Key Issues

The responses from Residents, Borough Councillors, Parish Councillors and Parish Councils were primarily concerned with the lack of justification for the uplift from the baseline jobs forecasts to accord with the Council's economic aspirations and the LEP's Strategic Economic Plan.

Whilst some Developers, landowners and agents supported the Council's approach to calculating jobs numbers, the majority considered that the uplift was too small as it did not reflect the historic rate of job creation in Warrington.

#### Conclusions

Having considered the representations, the Council has undertaken a comprehensive review of its housing and employment needs evidence base, using updated forecast and projection data. The draft Local Plan is still reflecting the Council's growth aspirations and scale of additional growth envisaged in the LEP's Strategic Economic Plan, but the Council acknowledges that the underlying jobs forecasts are more pessimistic due to uncertainties of Brexit and has amended its jobs calculation accordingly.

The downward revision of forecast jobs growth has resulted in a consequential reduction in the proposed Local Plan Housing target from 1,113 homes per annum to 945 homes per annum.

It is acknowledged that the final terms of the UK leaving the EU are not known and therefore it will be important to keep the Plan under review.

A summary of all issues under this theme and the Council's response to them are set out below in Table 1.

Table 3: Local Plan Jobs Growth - Issues and Responses

Issue	Respondent Type	Council Response
The increase in jobs has not been robustly justified	Residents, elected representatives	The Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the draft Local Plan post-dates the EU Referendum decision.
The jobs growth projections are	Residents, elected	The Council has undertaken a

<p>overestimated</p>	<p>representatives</p>	<p>comprehensive review of its housing and employment evidence base using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the draft Local Plan post-dates the EU Referendum decision.</p> <p>The downward revision of forecast jobs growth has resulted in a consequential reduction in the proposed Local Plan Housing target from 1,113 homes per annum to 945 homes per annum.</p>
<p>The Council's housing and employment forecasts pre-date the EU referendum decision. This evidence should therefore be re-assessed.</p>	<p>Residents, elected representatives</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the draft Local Plan post-dates the EU Referendum decision.</p>
<p>Brexit will have a negative impact on economic growth and will reduce immigration therefore the need for new homes will decrease.</p>	<p>Residents, elected representatives</p>	<p>The Council has updated its housing and employment evidence base using updated forecast and projection data. The economic forecast data used to inform the draft Local Plan post-dates the EU Referendum decision.</p> <p>The downward revision of forecast jobs growth has resulted in a consequential reduction in the proposed Local Plan Housing target from 1,113 homes per annum to 945 homes per annum.</p>
<p>New homes will be for commuters working in Liverpool and Manchester. Warrington is therefore providing for other area's housing needs.</p>	<p>Residents, elected representatives</p>	<p>An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.</p> <p>The Council has confirmed through Duty to Cooperate discussions that it will not be providing of the needs of neighbouring authorities, who have in turn have confirmed they will be meeting their own housing needs.</p>
<p>The location for new jobs does not match the provision of housing which will result in transport problems.</p>	<p>Residents, elected representatives</p>	<p>An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to</p>

		live and work in Warrington. The Local Plan is being produced in parallel to the Local Transport Plan to ensure that a greater proportion of existing and future residents can access jobs through sustainable transport modes.
There is scope for unemployed people to take up new jobs thereby reducing the need for new homes.	Residents, elected representatives	The Council has taken into account the potential to increase economic activity rates in carrying out its Local Housing Needs Assessment.
There is the opportunity to re-use derelict and vacant employment sites.	Residents, elected representatives	The Economic Development Needs Assessment (EDNA 2019) has carried out an assessment of vacant / underused / derelict employment sites in its assessment of existing supply. This has also fed into the work the Council has undertaken in identifying the capacity of the existing urban area to accommodate new homes through the update of its Strategic Housing Land Availability Assessment (SHLAA) and through its additional masterplanning across the town centre and surrounding areas.
There are insufficient employment areas identified to support the number of jobs being proposed.	Residents, elected representatives, developers/agents	The Local Plan is promoting sufficient land to meet its future development needs as evidenced in the Economic Development Needs Assessment (EDNA)
Insufficient consideration has been given to the potential impact of technology on the nature, number and location of future jobs.	Residents, elected representatives	The potential for technology has been taken into account in projecting future employment land requirements. The Plan will also be subject to regular review to assess the actual impact of technology over time, with the potential to update the Plan's spatial strategy or detailed policies if necessary.
Uplifted jobs numbers will become self-fulfilling if they are driving higher housing numbers.	Residents, elected representatives	The Council has followed a robust methodology in calculating the number of homes required to support its future economic aspirations.
There is a mismatch between the low paid jobs and the type of housing being provided in the Garden Suburb.	Residents, elected representatives	The Local Plan allocation for the Garden Suburb will ensure that a wide range of housing types and tenures is delivered. Similarly the proposed employment allocation in the Garden Suburb will deliver a range of job opportunities. Residents of the Garden Suburb will also have ease of access to a wider range of jobs across Warrington and the surrounding area.
The jobs uplift is unduly pessimistic and does not reflect	Developers/agents	Warrington's historic jobs growth reflects its status as a designated New Town. The

<p>the historic level of job creation that Warrington has achieved.</p>		<p>Council has undertaken a comprehensive review of its employment and housing evidence base following consultation on the PDO. Although the underlying jobs forecasts are showing a significant reduction in the rate of job creation overtime, the Local Plan housing target is based on the additional jobs the Council is confident will be created through its growth aspirations and in the context of the LEP's Strategic Economic Plan. The Council considers the jobs uplift reflects the Council's growth aspirations but is also a realistic assessment of the number of jobs that will be created over the Plan Period.</p>
<p>The jobs uplift is not consistent with the employment land methodology which is based on past trends.</p>	<p>Developers/agents</p>	<p>The Council has considered both past trends and jobs forecasts in its employment and housing evidence. The EDNA demonstrates there is not a linear relationship between jobs numbers and employment land requirements. Nevertheless, the ENDA and LHNA have reviewed the relationship between the Local Plan's employment land allocations and its housing target to ensure an appropriate balance.</p>
<p>The Council has not assessed whether the Experian assumptions around people working past retirement age are realistic. OBR economic activity rates are considered more realistic, which would result in a higher housing requirement.</p>	<p>Developers/agents</p>	<p>The Council has reviewed economic activity rates in the preparation of its Local Housing Need Assessment and is confident the Experian assumptions are most realistic for Warrington.</p>
<p>Support the Council's uplift to reflect the LEP's Strategic Economic Plan.</p>	<p>Developers/agents</p>	<p>Support Noted.</p>

#### Theme 4: Warrington’s need for employment land

##### Land Requirements for Employment (1), Employment Sites Promoted (2) and Types of Jobs Being Promoted (3) Imbalance of Land and Jobs (4)

No of responses Regulation 18 (Part 1)	(1) 16 (2) 0 (3) 0 (4) 0
No of responses Regulation 18 (Part 2)	(1) 179 (2) 838 (3) 174 (4) 62
Total	1269

#### Overview

There was a large response to the employment land proposals with the PDO, associated employment issues and how jobs growth relates to the need for housing. Developers, landowners and agents tended to provide much more detailed response to these issues than residents and community groups. This may be because calculating employment needs and its relationship with housing numbers is a relatively technical concept, and they also have a landed interest in potential development sites. The more detailed responses from the local community were provided by Borough Councillors, Parish Councillors and Parish Councils, some of whom used planning agents to respond on their behalf.

#### Key Issues

Respondents generally commented on the methodology used to calculate the amount of employment land needed, the types of jobs being created, the Functioning Economic Market Area (FEMA), the loss of employment land, and the suitability of submitted sites for employment development.

Submissions from developers, landowners and agents were generally supportive of the amount of land being proposed for employment development through the Preferred Development Option (PDO). However, some representations criticised the Council’s approach to losing employment land to alternative uses, that there is an under provision of employment land and that there is an imbalance between economic growth and the Plan’s housing target. Developers also questioned whether the proposed sites would meet Warrington’s future needs with the suggestion of alternative sites.

Residents general considered that the Plan was allocating too much land for employment, that the type of jobs being promoted will be of a relatively low quality and that there has been a lack of assessment of the required supporting infrastructure to support new employment locations. There was also a concern that there will be a mismatch between the new jobs that will be created and the

occupants of new homes in south Warrington, who are more likely to commute to Manchester and Liverpool.

### **Conclusion**

Having considered all the representations received, the Council is confident that its approach to calculating the required need for employment land is robust and in line with national policy requirements. The Council is therefore proposing to maintain the approach to calculating employment land by projecting forward past take up rates that consider both local and strategic employment needs. The Council is also confident that its approach to defining the Local Plan's housing requirement will ensure an appropriate balance between homes and jobs.

With regards to the types of jobs being promoted, the Council is confident that the identified employment allocations within the Proposed Submission Version Local Plan, together with the Council's regeneration proposals for inner Warrington and the borough's existing employment land supply, will support a wide range of jobs and reflect the findings of the EDNA Update (2019)

The Council therefore considers that the Proposed Submission Version Local Plan Policy Dev4 Economic Prosperity and Employment Development will ensure that economic development needs across the Borough will be met over the Plan period and beyond.

A summary of all issues under this theme and the Council's response to them are set out below in Table 4.

Table 4: Warrington's need for employment land - Issues and Responses

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
Forecasts used in the PDO pre-date Brexit, and Brexit will undoubtedly have a negative impact on economic growth, so calculations should be re-assessed to take into account the impacts of Brexit.	Residents, elected representatives	The Council has undertaken a comprehensive review of its housing and employment evidence base using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Proposed Submission Version Local Plan post-dates the EU Referendum decision.
Past trends suggest a higher rate of jobs growth compared to the SEP targets for Warrington, therefore higher rates of economic growth could be achieved, with a corresponding increase in housing delivery.	Other stakeholders, developers/agents	Warrington's historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in excess of the baseline jobs forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.  This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.
Retain a preference for	Other stakeholders	The Council has reviewed economic activity

<p>Economic Activity Rates (EAR) from OBR, rather than Experian, as Experian assume more people will work past pensionable age. Lower EAR would require a higher housing requirement to meet the need to provide for a greater pool of labour.</p>		<p>rates in the preparation of its Local Housing Need Assessment and is confident the Experian assumptions are most realistic for Warrington. This also ensures consistency of approach across the Mid-Mersey Housing Market Area.</p>
<p>Proposed type of employment envisaged is incompatible with the nature of the proposed residential plans - mismatch for local residents opportunities.</p>	<p>Residents</p>	<p>An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.</p> <p>The Proposed Submission Version Local Plan will ensure that Warrington's employment land supply will provide a wide range of jobs, meeting the needs identified in the Council's Economic Development Need Assessment (EDNA).</p>
<p>Will the employment areas that form part of the strategic plan and be governed by delivery vehicles or left to the market to decide?</p>	<p>Residents</p>	<p>The Proposed Submission Version Local Plan will provide a clear framework for the private sector to invest in new employment opportunities. The Plan will however ensure that development contributes to delivering the infrastructure required to support Warrington's growth. The Council will take a leading role on coordinating infrastructure delivery, working with public sector agencies as well as private developers. The Council's regeneration partnership Warrington &amp; Co will take more of a leading role in coordinating development within inner Warrington, where comprehensive brownfield development opportunities are often more complex to deliver.</p>
<p>The people who will be living in the urban extensions will likely commute out of Warrington so will not be working in the new proposed employment areas.</p>	<p>Residents</p>	<p>An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.</p>
<p>The disparity between preferred [LEP Devolution] scenario employment land target of 136.88ha and the employment land OAN figure of 381ha is excessive and it can only concluded that an</p>	<p>Developers/agents</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform</p>



<p>employment land OAN figure of 381ha would sustain a level of job growth far in excess of the level proposed in the LEP devolution scenario which underpins the housing requirement of 1,113dpa.</p>		<p>the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>In line with national policy requirements (and taking into account the Council’s employment land monitoring take up rates over the last 20 years, that include periods of recession), the updated EDNA (2018) projects forward over the Plan period past employment land take up rates to calculate the required amount of land over the Plan period. The Council therefore considers this to be a robust approach to calculating employment land needs.</p> <p>The EDNA demonstrates that there is not a linear relationship between growth in job numbers and employment land requirements. Warrington’s historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in excess of the baseline jobs forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.</p> <p>This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>The proposed Appleton Thorn/ Barleycastle industrial area extension would attract HGV's which would necessitate new infrastructure, such as a new junction with the M6 or M56.</p>	<p>Residents, elected representatives</p>	<p>The requirements for new infrastructure have been assessed through the Council’s Multi Modal Transport Model, as well as through liaising with Highways England in relation to the needs of the Strategic Road Network. The allocation policy relating to the Garden Suburb requires improvements to infrastructure to be appropriately phased to support new development and mitigate any impact on the existing road network.</p>
<p>Fiddlers Ferry Power Station is a brownfield site that will be available for employment uses within the Plan period, so therefore no need to release Green Belt land for employment uses.</p>	<p>Residents, elected representatives</p>	<p>The owner and operator of Fiddlers Ferry Power Station have indicated that the site will be vacant within the Plan period for potential employment uses. However, this is likely to be near the end or beyond the Plan period and will require decommissioning and could also require</p>

		significant remediation before it is brought back into active employment use. Whilst this does not give sufficient certainty to formally allocate the site, its potential future redevelopment means the Council is no longer proposing to safeguard land for future employment development beyond the Plan period.
Methodology used to calculate employment land needs should be reconsidered taking into account forecasted reductions in the population growth.	Elected representatives	Methodology for predicting employment land OAN is based on demand for land from businesses, a Forward Projection of Past Take Up, not labour supply. Population projections are not directly relevant to this calculation.
Warrington has experienced losses of designated employment land/areas to residential uses over recent years, and this trend appears to be continuing (Omega for example). The proposed loss of Palatine Industrial Estate, land at Centre Park etc., means Warrington appears to have insufficient readily available developable land for employment purposes.	Other stakeholders	Agree that some employment land has been lost to other uses over recent years and will continue to be so. However, based on projecting past employment land take up rates forward over the next 20 years, applying a 20% buffer and taking into account the loss of employment land/areas through the implementation of the Warrington Means Business Regeneration Programme, the Council is confident that through its updated EDNA (2019), that it has identified enough deliverable employment land for the 20 year Plan period.
Flawed approach taken in the Council's EDNA. Reputable economic forecasts have been commissioned and ignored in favour of the simplistic projection forward of past employment land take up rates. Past take up rates is not the basis for the future planning of the area, the buoyancy of the market is being over estimated.	Elected representatives	In line with national policy requirements (and taking into account the Council's employment land monitoring take up rates over the last 20 years, that include periods of recession), the updated EDNA (2019) provides the justification and conclusion as to why past take up rates of employment land across the Borough is the most appropriate method for calculating employment land needs for the Plan period. The EDAN also considers detailed market evidence in coming to this conclusion.
Economic growth should be based on quality professional jobs, whereas the type of jobs being proposed for B8 uses are low quality, low density, and with the prospect of automation (PwC project a 30% loss of jobs due to this) in this sector, do not make exceptional circumstances to	Residents, elected representatives	The Council is required to meet its employment land needs and this forms part of the case for the exceptional circumstances required to amend Green Belt boundaries. The individual proposed allocations themselves each demonstrate their own exceptional circumstances which adds to the case. As the largest use in spatial land use terms, B8 receives the largest proportionate land share. However,

amend Green Belt boundaries.		Proposed Submission Version Local Plan will provide an overall land supply which will support a wider range of employment needs and create a wider range of employment opportunities.
Based on the Metro-Dynamics Report (June 2017), Transport & Storage jobs will increase by 3.8%-4.2%, what the PDO fails to acknowledge is that the bulk of the projected jobs growth for Warrington is in financial services and business services.	Developers/agents	EDNA 2018 indicated that some 73 ha should be made available to support B1 (a) offices uses including growing sectors such as financial and business services. The current Masterplan provides for a high level of growth in Central Warrington.
In the context of promoting the Alcan Factory for residential development, a review of existing employment areas must be undertaken, ahead of pre-publication stage, to identify sites where there is no reasonable prospect of a site being used for that purpose, and alternative uses should be incorporated to their applicable policies.	Developers/agents	The Council's Economic Development Needs Assessment has carried out a review of the quality and suitability of existing employment locations in confirming Warrington's existing employment land supply.
Concerned about overprovision of employment land due to lack of regional overview from combined LPAs.	Other stakeholders	The Economic Development Needs Assessment gives detailed consideration to Warrington's economic within the wider sub-regional context in which it operates. This considers issues such as development prospects along the M62/East Lancs Corridors, the growth of the Port of Liverpool and competition from Manchester. The Council has also engaged with neighbouring authorities and the Cheshire & Warrington Local Enterprise Partnership in preparing the draft Local Plan.
Conditionally support the findings of the EDNA and the broad areas of growth proposed in Table 9 of the PDO.	Developers/agents	Comment duly noted.
Infrastructure constraints on some Central Warrington Sites (including Warrington Waterfront sites) may affect delivery and increase reliance on Green Belt options.	Developers/agents	The Proposed Submission Version Local Plan is based on a detailed understanding of infrastructure requirements to support the proposed level and location of development. The Local Plan will ensure infrastructure delivery is appropriately

		phased to support new development and mitigate the impacts on existing infrastructure.
No allowance should be made for brownfield land emerging from the closure of Fiddlers Ferry Power Station, over the Local Plan Period.	Developers/agents	No allowance is made for any employment land supply at Fiddlers Ferry Power Station within the Plan Period, reflecting agreed uncertainty over its future. Its potential future redevelopment does mean however that the Council is no longer proposing to safeguard land for future employment development beyond the Plan period.
Land at M6 J20/M56 J9 (i.e. Garden Suburb) performs strongly against criteria set out in the EDNA and aligns job growth and a new strategic employment site as part of a wider Garden City Suburb.	Developers/agents	Comments duly noted.
Feel that it is too early in the development process to identify strategic development phasing as this should be developed in conjunction with the developers, linked to a detailed Highways strategy. The whole Langtree holding in South East Warrington, 96 ha, could be delivered in five years, contrary to the PDO trajectory, which sees delivery over years 6-10, 11-15.	Developers/agents	The Proposed Submission Version Local Plan contained appropriate phasing clauses within the allocation policies to ensure infrastructure delivery is appropriately phased to support new development and mitigate the impacts on existing infrastructure.
General Support for proposed employment locations and scale of growth proposed. However, smaller sites will also need to be brought forward in addition to larger strategic sites to provide for the remaining employment land. Also, to avoid 'cramming' options onto dense urban sites which will increase congestion, etc. in Central Warrington. There are suitable sites at Winwick close to Junction 9 of M62. This is in the context of promoting sites R18/045/046-	Developers/agents	Warrington will need both a local and strategic employment land supply to support comprehensive growth. The Proposed Submission Version Local Plan's overall proposed employment land supply is considered appropriate to meet both strategic and local needs.

<p>Land north and south of Townsfield Lane, Winwick.</p>		
<p>The National Planning Practice Guidance states that an assessment of future land needs should be determined by looking at both past trends and future forecasting methods. This is acknowledged in the consultation document. However, the proposed future employment land requirement does not take into account any future forecasting. In particular, it does not take into account potential future initiatives and ambitions for Warrington and the North of England that could have significant implications for economic growth and employment land requirements in Warrington. In particular, relying solely on past employment land take-up trends does not take into consideration the potential impacts of either the Northern Powerhouse Agenda, the Devolution Bid or the benefits to the region of HS2, never mind the current investment in the port of Liverpool.</p>	<p>Developers/agents</p>	<p>A full range of Policy On and Policy Off forecast models are completed in the 2016 EDNA and this study, reflecting national guidance. Paragraphs 8.66-8.69, Pages 154-156 of the 2016 EDNA provide a justification of why the Forward Projection of Take Up is the preferred OAN method. The key argument is that that forecast models produced against the Northern Powerhouse Agenda, the Devolution Bid and SEP/New City growth all produce OAN levels well below what Warrington has achieved in Past Take Up.</p>
<p>Consider that the local planning authority should not rely on an expansion of the Omega site to meet employment need, and indeed, we consider that given the uncertainty over the status of the St Helens Plan, the capacity of Junction 8 of the M62 and therefore the ability for an expansion of Omega to be deliverable, there should be no reliance of an extension to Omega in the plan to meet employment need. Instead, further land</p>	<p>Developers/agents</p>	<p>Through the Duty to Cooperate, the Council has agreed in principle that the western extension of the existing Omega development proposed in the emerging St Helens Local Plan will contribute to meeting Warrington’s employment land requirement. This is subject to ensuring that satisfactory access arrangements, together with appropriate mitigation can be achieved. The Council has included the western extension in its Transport Modelling work and is confident that the principle of the allocation is robust. The Council does however consider that any further development in proximity to J8 M6 will not be possible without a significant</p>

<p>should be allocated close to the Garden City Suburb and Junction 9 of the M56.</p>		<p>upgrade to the Strategic Road Network.</p>
<p>Higher economic growth assumptions risks relocating employment from poorer areas, rather than creating new jobs.</p>	<p>Elected representatives</p>	<p>Disagree, companies will relocate for a range of practical regions, including the need to grow premises, move closer to customers/suppliers or away from an undesirable feature of their present location (traffic congestion, etc.). They will not automatically relocate just because land is provided in a high growth area nearby.</p>
<p>Agree with the EDNA assessment that the actual take-up of employment land over the past 20 years has been much higher than what would have been predicted based on econometric forecasting and agree with their conclusions that the need is 380.90 ha to 2037.</p>	<p>Developers/agents</p>	<p>Comments duly noted.</p>
<p>The Council's apparent decision to pursue a level of employment growth that is less than previous trends effectively represents a reduction in the borough's growth and is substantially less than the 'Northern Powerhouse' proposals. This lowering of the Council's ambitions is inconsistent with its objective of moving from a New Town to a New City and fails to make the most of Warrington's economic strengths.</p>	<p>Developers/agents</p>	<p>Warrington's historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in excess of the baseline jobs forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.</p> <p>This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>The EDNA highlights the need for land for other uses including leisure, medical and retail uses in order to protect the existing employment areas from pressure. The Council should therefore ensure that employment sites are allocated that help meet the above needs and thereby reduce pressure for change of use on industrial parks.</p>	<p>Developers/agents</p>	<p>Warrington will need both a local and strategic employment land supply to support comprehensive growth. The draft Local Plan's overall proposed employment land supply is considered appropriate to meet both strategic and local needs.</p> <p>The Council is confident its assessment of spatial options, assessment of individual sites and the SA/SEA process has identified the best locations for land to be allocated for employment development.</p>

<p>Given the dominance of Omega on current land supply there is a need to widen the supply, not just in quantitative terms, but also to provide a variety of sites of different sizes, in different locations and various ownerships, to provide competition and choice for business.</p> <p>Disagree with the Council's approach of concentrating new employment land in the three locations of Omega; south east at j9, M56 and Warrington Waterfront. The A49 is an established corridor that is popular with employers and has good transport links.</p> <p>Promoted sites R18/P2/127A: Land West of Delph Farm and R18/P2/127B: Land East of Newton Road, are submitted to address the points raised above.</p>		
<p>Feel that housing need is being created by creating a need for employment and vice versa, thus numbers are not based on genuine need.</p>	<p>Elected representatives</p>	<p>The Proposed Submission Version Local Plan Housing target reflects the Council's growth aspirations and its commitment to address the increasing problem of affordability of housing, particularly for Warrington's younger people and young families. The proposed target has however been reduced from 1,113 to 945 homes per annum, reflecting lower economic growth forecasts following the EU referendum.</p> <p>The target of 945 homes per annum is consistent with Planning Practice Guidance which confirms the government is supportive of ambitious authorities who want to plan for growth and that higher housing levels are appropriate where a growth strategy is in place (PPG: Housing need assessment - paragraph 10).</p>
<p>The EDNA makes references to the Devolution Bid and work by the Cheshire and Warrington Local Economic Partnership (LEP). The</p>	<p>Developers/agents</p>	<p>A full range of Policy On and Policy Off forecast models are completed in the 2016 EDNA and the study update (2018), reflecting national guidance. Paragraphs 8.66-8.69, Pages 154-156 of the 2016 EDNA</p>

<p>Devolution Bid Sensitivity Test sets out an agenda for growth and the report adds that Warrington should consider this as aspiration even if it does not proceed as envisioned. It is not clear how this has been factored into the overall employment land needs.</p>		<p>provide a justification of why the Forward Projection of Take Up is the preferred OAN method (the same arguments are found in Section 7.0 of this Study). The key argument is that that forecast models produced against the Northern Powerhouse Agenda, the Devolution Bid and SEP/New City growth all produce OAN levels well below what Warrington has achieved in Past Take Up.</p>
<p>It is not clear how the conclusion has been reached that the FEMA, as identified in Section 7.0 of the 2016 FEMA, extends to the whole of Cheshire West and Chester, along with a number of other authorities.</p>	<p>Neighbouring Councils</p>	<p>The Council accepts that the Warrington's FEMA relates to the borough itself. The Economic Development Needs Assessment does however consider Warrington's economic in the context of the wider sub-region, including its relationship with Cheshire West &amp; Chester.</p>
<p>Table ES2 states for the M56 corridor that 'Stakeholders showed strong support for the provision of a new strategic site(s) along the M56 corridor...' and a 'A sub-set of the general need, focused on the Manchester Ship Canal and Port Warrington'. It would be helpful to understand which stakeholders these statements refer to.</p>	<p>Neighbouring Councils</p>	<p>Comment refers primarily to property market stakeholders – developers and their agents. The results of these consultations were provided in Paragraphs 4.33-4.40, Pages 67-72 of the 2016 EDNA.</p>
<p>Note that the defined Functional Economic Market Area for Warrington in the EDNA has significant crossover with the Greater Manchester area (in particular Wigan, Trafford and Salford and Manchester City Centre), and the GMSF process as noted above. The GMSF will obviously have a significant bearing on employment land patterns in Warrington.</p>	<p>Developers/agents</p>	<p>The Council accepts that the Warrington's FEMA relates to the borough itself. The Economic Development Needs Assessment does however consider Warrington's economy in the context of the wider sub-region, including Greater Manchester. The Council has engaged positively with Greater Manchester authorities through the Duty to Cooperate and will continue to do as the Warrington Local Plan and the GMSF progress.</p>
<p>Support the amount of employment land proposed and sites proposed.</p>	<p>Developers/agents</p>	<p>Comments duly noted.</p>
<p>The Stretton airfield site should be considered. This is a huge area of derelict land</p>	<p>Residents, elected representatives</p>	<p>This site has never been submitted to the Council, or promoted by the Owner as a potential site for consideration as an</p>



<p>that is situated near to the “Planned Major Employment Site” at J20 of the M6/M56.</p>		<p>employment site to meet Warrington’s identified need.</p>
<p>The proposed employment allocation in the Garden City Suburb is located 14km from Manchester Airport (20min drive time along M56). The Local Plan should consider the potential for aviation and airport related development at the site.</p>	<p>Other stakeholders</p>	<p>It is considered that this site, subject to the occupiers business, could strategically support aviation related development.</p>
<p>Object to the Omega westward expansion into St Helens.</p>	<p>Residents, elected representatives</p>	<p>The Omega wets site is considered to be a logical extension to the existing and successful Omega site which has provided over 3,000 jobs over the last 3 to 4 years and is a key part of Warrington’s economic growth. Given its strategic location, the 31 hectare site has been identified to meet Warrington’s Economic Development Needs.</p> <p>As with all such proposals, Warrington BC and St Helens BC will work together to ensure that access and highways implications are properly addressed, on both the local and strategic road networks.</p>
<p>Object to the approach to employment site selection and the location of the proposed employment sites. More details are required.</p>	<p>Residents, elected representatives</p>	<p>The Council has undertaken a comprehensive sites assessment process to consider all reasonable options for allocation of employment sites. This work is provided as supporting evidence base to the Proposed Submission Version Local Plan.</p>
<p>No evidence to demonstrate that there has been an assessment of the impact on the historic environment in confirming the preferred locations for employment.</p>	<p>Other stakeholders</p>	<p>In preparing the Proposed Submission Version Local Plan, Officers from the Council have worked extensively with Historic England to ensure that the evidence base and the Submission Version Local Plan Policies are appropriate to protect and enhance the Historic Environment. Heritage Impact Assessment has been undertaken for all proposed site allocations.</p> <p>Based on the extensive liaison with Historic England, it is therefore considered that the Heritage Impact Assessments and Policy</p>

		<p>DC2 The Historic Environment set out a clear approach and guidance on how proposed development should safeguard and respond to the historic environment. It also sets out the Council's strategy for securing and conserving the historic environment and the Borough's heritage assets.</p>
<p>Site Ref: R18/106 - There are residential properties within this site that are not within the ownership of the applicant. Neither, the DPO or the Agents documentation promoting this site acknowledges the existence of these properties. The indicative plan illustrates the intention for large scale industrial units surrounding the Cottages which are totally incompatible with residential use.</p>	<p>Residents</p>	<p>It is noted that the residential properties are not within the ownership of the applicant who is promoting the site.</p> <p>Through the Garden Suburb design and Masterplanning work, and Local Plan policy formulation, consideration has been given to the amenity of the nearby residents.</p> <p>It is considered that the Policies of the Proposed Submission Version Local Plan are appropriate to protect the amenity of existing and future residents of the Borough from inappropriate development.</p>
<p>Highways England supports employment development in the most accessible and sustainable locations, however we would seek detailed evidence in relation to employment locations to substantiate potential impacts upon the SRN.</p>	<p>Other stakeholders</p>	<p>In preparing the Proposed Submission Version Local Plan, Officers from departments of the Council have worked extensively with Highways England through the Duty to Cooperate process to ensure that the evidence base and the Submission Version Local Plan Policies are appropriate to protect and enhance the Local and Strategic Road Network.</p> <p>Highways England will be aware that the Council's Warrington Multi Modal Transport Model (2016) has been developed to test the highway implication of the proposed amount and location of development.</p>
<p>Object to the development of Port Warrington and the loss of Moore Nature Reserve.</p>	<p>Residents, elected representatives, neighbouring Councils</p>	<p>Port Warrington is a locational specific development site in that Port related activity can only be carried out on a main waterway. Evidence and justification for the site's expansion and development has been submitted by the owner of the site and Moore Nature Reserve.</p> <p>Mitigation and enhancement measures in relation to Moore Nature Reserve have been incorporated into the relevant</p>

		<p>allocation policy of the Submission Version Local Plan.</p> <p>It is therefore considered that the Proposed Submission Version Local Plan provides an appropriate strategy for the development of Port Warrington.</p>
<p>Road infrastructure can't cope in the location of the proposed employment sites, and the Motorways are always blocked and or congested due to sheer volume of traffic and accidents.</p>	<p>Residents, elected representatives</p>	<p>In preparing the Proposed Submission Version Local Plan, Officers from departments of the Council have worked extensively with Highways England through the Duty to Cooperate process to ensure that the evidence base and the Submission Version Local Plan Policies are appropriate to protect and enhance the Local and Strategic Road Network.</p> <p>The Council's Infrastructure Delivery Plan contains details of the schemes needed to mitigate the impacts of the proposed developments, and the Council has used the Warrington Multi Modal Transport Model (2016) to test the highway implications of the proposed amount and location of development.</p>
<p>Sites have multiple owners and some have agricultural ties. Achieving Agreement to develop the site will be problematic.</p>	<p>Residents</p>	<p>Where it has come to the attention of the Council that sites are, or might be in multiple owners, every effort has been made by the Council to engage with the owners to ensure that landed interests do not prejudice the availability or the deliverability of potential development sites.</p>
<p>Insufficient use of Brownfield sites for employment development.</p>	<p>Residents, elected representatives</p>	<p>All the available Brownfield sites have been included in the calculation of the Council's employment land provision.</p>
<p>Majority of the jobs created (Warehousing and Distribution) will be low density, low skilled and low paid. These people will not be able to afford the high house prices that will result from development in the south of the Borough. Also, the jobs will not be for local Warrington people.</p>	<p>Residents, elected representatives</p>	<p>An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.</p> <p>As the largest use in spatial land use terms, B8 receives the largest proportionate land share. However, the draft Local Plan will provide an overall land supply which will support a wider range of employment needs and create a wider range of employment opportunities.</p>

		The Proposed Submission Version Local Plan will also ensure a wide range of housing is provided within south Warrington, including provision of affordable housing.
In Lymm a further 500 houses would Require employment for a minimum of 500 people. There is insufficient employment in the immediate area which would again require people to travel outside the area.	Residents	An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.  The update Economic Development Needs Assessment (EDNA 2019) identified a need for small scale employment development in Lymm, and this has been reflected in the Proposed Submission Version Local Plan.
The suggested 'need' for increased acreage for employment sites is grossly over-exaggerated. It does not reflect the current economic position and is likely to cause increased financial instability.	Residents, elected representatives	In line with national policy requirements (and taking into account the Council's employment land monitoring take up rates over the last 20 years, that include periods of recession), the updated EDNA (2019) projects forward over the Plan period past employment land take up rates to calculate the required amount of land over the Plan period. The Council therefore considers this to be a robust approach to calculating employment land needs.
Methodology used to calculate Employment Land Needs should be reconsidered taking into account forecasted reduction in population growth.	Residents, elected representatives	The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Proposed Submission Version Local Plan post-dates the EU Referendum decision.
Welcome aspiration to align housing requirement with job growth, however the use of the LEP Devolution Scenario is flawed as it is below historic job growth figures for Warrington. Concerns also in relation to the unclear nature of the SHMA and level of job growth/employment land OAN. Huge disparity between employment land target of	Developers/agents	The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.  In line with national policy requirements (and taking into account the Council's

<p>136.88ha and employment land OAN figure of 381ha.</p>		<p>employment land monitoring take up rates over the last 20 years, that include periods of recession), the updated EDNA (2019) projects forward over the Plan period past employment land take up rates to calculate the required amount of land over the Plan period. The Council therefore considers this to be a robust approach to calculating employment land needs.</p> <p>The EDNA demonstrates that there is not a linear relationship between growth in job numbers and employment land requirements. Warrington’s historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in excess of the baseline jobs forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.</p> <p>This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>Generating 125,000 jobs in Warrington over the 25 years is unrealistic, and setting housing requirements around this would appear backwards.</p>	<p>Residents</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>This has resulted in a downward revision of forecast jobs growth and has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>Much of the new employment appears to be in North Warrington, whilst most housing is in South Warrington.</p>	<p>Residents</p>	<p>An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.</p> <p>Whilst there is a considerable amount of</p>

		existing employment in north Warrington, the majority of the new employment is proposed in the south of the Borough.
Option 2 is based on excess employment and economic growth outlook that is based on very high level aspirational assumptions and considerations completely outside the control or influence of WBC and ignore the competing aspirations of adjacent and further afield housing areas. Any higher housing target should be a consequence, not a cause of economic and demographic experience and requires detailed evidence if it is to be factored into any LDP.	Residents	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>This has resulted in a downward revision of forecast jobs growth and has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
Council's aspiration for employment growth will give greater pressure for more housing.	Residents, developers/agents	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>This has resulted in a downward revision of forecast jobs growth and has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
The scale of economic growth identified is not aligned with previous economic growth of the Borough which would suggest that an increase in housing provision is still desirable.	Developers/agents	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>In line with national policy requirements (and taking into account the Council's employment land monitoring take up rates over the last 20 years, that include periods</p>

		<p>of recession), the updated EDNA (2019) projects forward over the Plan period past employment land take up rates to calculate the required amount of land over the Plan period. The Council therefore considers this to be a robust approach to calculating employment land needs.</p> <p>The EDNA demonstrates that there is not a linear relationship between growth in job numbers and employment land requirements. Warrington’s historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in excess of the baseline jobs forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.</p> <p>This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>It is noted that the Council base their projected land need on past take-up yet do not consider this a robust basis for forecasting job growth in the future. Whilst this is justified on the basis that growth sectors such as distribution generate very low employment densities, this is not clearly evidenced; and could generate imbalances in the future, if employment densities continue at current levels.</p>	<p>Developers/agents</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>In line with national policy requirements (and taking into account the Council’s employment land monitoring take up rates over the last 20 years, that include periods of recession), the updated EDNA (2019) projects forward over the Plan period past employment land take up rates to calculate the required amount of land over the Plan period. The Council therefore considers this to be a robust approach to calculating employment land needs.</p> <p>The EDNA demonstrates that there is not a linear relationship between growth in job numbers and employment land</p>

		<p>requirements. Warrington’s historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in excess of the baseline jobs forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.</p> <p>This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>Job creation is relatively low in the distribution sector and forecasts show reductions in the rate of job growth according to your document, so the need for so much further housing development is not proven.</p>	<p>Elected representatives</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>This has resulted in a downward revision of forecast jobs growth and has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>Employment opportunities should not be built speculatively; there is no guarantee of opportunities just arising.</p>	<p>Residents</p>	<p>The Council’s Economic Development Assessment (EDNA 2019) concludes that over the Plan period, there is a need for 362 hectares of employment land across the Borough; therefore, there is a clear demand for employment development.</p>
<p>Questions the statement that housing figure is driven by increased employment opportunities as a significant proportion of the workforce will come from outside of Warrington.</p>	<p>Residents, elected representatives</p>	<p>An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.</p> <p>The Council has followed a robust methodology in calculating the number of homes required to support its future economic aspirations.</p>
<p>Warehousing does not create significant amounts of jobs, and less so in the future with fully automated warehouses</p>	<p>Residents, elected representatives</p>	<p>The potential for technology has been taken into account in projecting future employment land requirements. The Plan will also be subject to regular review to</p>



<p>becoming the norm.</p>		<p>assess the actual impact of technology over time, with the potential to update the Plan's spatial strategy or detailed policies if necessary.</p>
<p>Has the economic slowdown over the next few years been considered, as this mean that the historical high levels of employment in Warrington will not continue to be the case. Brexit appears to not have been considered here.</p>	<p>Residents, elected representatives</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>This has resulted in a downward revision of forecast jobs growth and has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>Employment is growing faster than housing stock.</p>	<p>Developers/agents</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>In line with national policy requirements (and taking into account the Council's employment land monitoring take up rates over the last 20 years, that include periods of recession), the updated EDNA (2019) projects forward over the Plan period past employment land take up rates to calculate the required amount of land over the Plan period. The Council therefore considers this to be a robust approach to calculating employment land needs.</p> <p>The EDNA demonstrates that there is not a linear relationship between growth in job numbers and employment land requirements. Warrington's historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in access of the baseline jobs</p>

		<p>forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.</p> <p>This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>The identified housing requirement does not go far enough. The scale of economic growth identified is not aligned with previous economic growth of the borough which would suggest that an increase in housing provision is still desirable.</p>	<p>Developers/agents</p>	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>In line with national policy requirements (and taking into account the Council’s employment land monitoring take up rates over the last 20 years, that include periods of recession), the updated EDNA (2019) projects forward over the Plan period past employment land take up rates to calculate the required amount of land over the Plan period. The Council therefore considers this to be a robust approach to calculating employment land needs.</p> <p>The EDNA demonstrates that there is not a linear relationship between growth in job numbers and employment land requirements. Warrington’s historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in excess of the baseline jobs forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.</p> <p>This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>
<p>Welcome the recognition that the amount of land allocated</p>	<p>Developers/agents</p>	<p>Comments duly noted.</p>

<p>in the Local Plan is directly related to how much economic growth it will attract. We agree with the EDNA assessment that the actual take up of employment land over the past 20 years has been much higher than would have been predicted based on econometric forecasting and agree with their conclusions that the need is 380.9ha to 2037.</p>		
<p>Due to the southern location of the proposed housing adjacent to the M56, the incoming residents will often not be employed in Warrington; they will use the M56 and M62 to work elsewhere. Where is the evidence that clearly demonstrates Warrington's economy will create jobs for people living in the proposed developments? Warehousing does not create significant amounts of jobs, and less so in the future with fully automated warehouses becoming the norm. The proposed "Green" southern housing developments of Warrington will function as suburbs to Manchester, Liverpool and Chester.</p>	<p>Residents, elected representatives</p>	<p>An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.</p> <p>The potential for technology has been taken into account in projecting future employment land requirements through the Council's update EDNA (2019).</p>
<p>Calculations do not reflect the percentage of businesses that will just relocate within the Borough to newly developed land, leaving the old ageing property unused. This will not result in a net increase in jobs and in turn housing requirements.</p>	<p>Residents</p>	<p>The Council's Economic Development Assessment (EDNA 2019) concludes that over the Plan period, there is a need for an additional 362 hectares of employment land across the Borough. The EDNA included a detailed review of the quality of Warrington's existing employment supply and has taken into account where existing premises are likely to be redevelopment through the Council's regeneration proposals in and around the town centre. The Council is therefore confident the additional employment land requirement will support additional growth and that the overall land supply will support existing as</p>

		well as new businesses.
More home workers means less land needed.	Residents	The potential for technology (including changing working practices) has been taken into account in projecting future employment land requirements.
The PDO makes insufficient provision for employment needs for localised needs which are not met by strategic opportunities. The Councils aspiration for employment growth will give greater pressure for more housing.	Developers/agents	<p>The Council has undertaken a comprehensive review of its housing and employment evidence base post the PDO using updated forecast and projection data and in accordance with the latest Government planning policy and guidance. The economic forecast data used to inform the Submission Version Local Plan post-dates the EU Referendum decision.</p> <p>In line with national policy requirements (and taking into account the Council’s employment land monitoring take up rates over the last 20 years, that include periods of recession), the updated EDNA (2019) projects forward over the Plan period past employment land take up rates to calculate the required amount of land over the Plan period. The Council therefore considers this to be a robust approach to calculating employment land needs.</p> <p>The draft Local Plan’s overall proposed employment land supply is considered appropriate to meet both strategic and local needs.</p> <p>The EDNA demonstrates that there is not a linear relationship between growth in job numbers and employment land requirements. Warrington’s historic rate of jobs growth is not considered to be sustainable over the Plan period. The Council does however consider that its growth aspirations will deliver a level of growth in excess of the baseline jobs forecast, but recognises that the baseline jobs forecasts have been revised downwards since the PDO consultation.</p> <p>This has resulted in a consequential reduction in the proposed Submission Version Local Plan Housing target from 1,113 homes per annum to 945 homes per annum over the Plan period.</p>



## Theme 5: Other Development Needs

### Other Development Needs

No of responses Part 1	1
No of responses Part 2	15
<b>Total</b>	<b>16</b>

#### Overview

Responses in this category were more limited. This is because most issues have been picked up under defined subject headings and this category was to ensure that any other development needs or issues could be picked up and addressed.

Responses ranged from residents and councillors to landowners, businesses and other stakeholders. The issues raised varied significantly and these are highlighted below.

#### Key Issues

Given the broad nature of this category, issues raised varied greatly from locally specific issues to more strategic regional considerations.

Strategic level issues related to considering the regional benefits of Manchester Airport, allowing for the HS2 route in proposals, considering the importance of minerals reserves in the Plan area and providing sufficient utilities infrastructure at a Borough-wide.

More locally specific concerns related to the nature of retail development proposed in different parts of the Borough, allocating appropriate new employment sites and protecting existing ones, creating sustainable communities, ensuring adequate provision of leisure and open green space and considering the quality and value of agricultural land.

A further comment related to the lack of evidence supporting the PDO at the time of consultation.

#### Conclusion

The Proposed Submission Draft Local Plan addresses this broad range of issues and indeed, many of the concerns have been addressed as the Council's evidence base has been expanded and updated in support of the draft Plan. Many of the concerns are addressed in detail in specific themes – for example, concerns relating to retail, sustainability and infrastructure.

A summary of all issues under this theme and the Council's response to them are set out below in Table 5.

Table 5: Other Development Needs - Issues and Responses

Issue	Respondent Type	Council Response
There is no mention in the PDO Document of the role that Manchester Airport plays in the local or regional economy.	Other stakeholders	The Proposed Submission Version Local Plan makes reference to Manchester Airport in the 'Warrington in Context' chapter of the draft document. The

		importance of the airport is recognised and its role in the local and regional economy.
The new plan should accommodate normal population growth, concentrate on affordable homes, discourage disproportionate car growth and deal with existing and future traffic problems and pollution.	Elected representatives	The level of growth proposed in Warrington has been assessed in great detail and the Council is confident in the strategy proposed for the plan period. The Proposed Submission Version Local Plan places great emphasis on the need for affordable homes and seeks to create sustainable communities which are not dependent on car use.
Retail - Concerns about the potential scale of Warrington's 'city centre' and the impact on adjoining authority areas. Engagement with adjoining authorities is essential.	Other stakeholders	The Proposed Submission Version Local Plan is based on an updated Retail Needs Assessment. This has confirmed there is only limited need for additional retail floorspace in Warrington, predominantly to support the main development allocations. Growth in the town centre is predominantly to increase residential, business, leisure and cultural uses. The Council considers its proposals for the town centre to be proportionate to the function of the town centre in the wider sub-region.
The borough's residents need not only jobs and homes, but also leisure opportunities that enrich the quality of life. The Plan should therefore identify treasured areas that act as 'green lungs' for Warrington.	Elected representatives	The importance of green space and accessible leisure facilities is acknowledged within the Proposed Submission Version Local Plan. Indeed improving access to such facilities is a key priority both within the existing urban area and in the proposed main development areas.
Adequate employment sites should be allocated to reflect modern employment needs. This will protect existing older employment sites from significant change.	Developers/agents	The Council is committed to protecting existing employment areas whilst creating new employment sites to meet future needs. This is clearly set out in Policy DEV4 Economic Growth and Development.
Require an environmentally friendly plan which is genuinely based on community and citizen led needs rather than one which is land speculator / developer led.	Residents	The Council is committed to meeting the needs of residents of the Borough, both current and future, and seeking input and responses from residents and communities to inform decision making. The Proposed Submission Version Local Plan seeks to meet these needs in accordance with government requirements.
Retail Need - the proposal for a new district centre will need	Developers/agents	The proposed new District Centre within the Garden Suburb has been

<p>to be fully tested in terms of need. Policies should ensure that any retail floorspace does not have an adverse impact on existing centres.</p>		<p>downgraded to a Neighbourhood Centre as more detailed work has been carried out as to the scale of requirements in this area. Further work will be ongoing as more detailed masterplanning work continues once the Local Plan has been adopted. In addition, Policy DEV5 sets out requirements for retail development across the Borough to ensure that any new proposals are of an appropriate scale.</p>
<p>PDO not based upon extensive research.</p>	<p>Elected representatives</p>	<p>Since publication of the PDO, a significant amount of work has been carried out in updating the Council's evidence base and this has informed the Proposed Submission Version Local Plan, as referred to in each of the draft policies.</p>
<p>Regard needed for the extensive area of unworked minerals reserves which the Local Plan area covers. Clear strategy required.</p>	<p>Other stakeholders, Neighbouring Councils</p>	<p>Minerals reserves have been considered in the preparation of the Proposed Submission Draft Local Plan and specifically within the various site assessments which have been undertaken to determine to chosen spatial strategy for the Borough. Policies ENV3 – ENV8 set out the Council's approach to the protection of mineral reserves.</p>
<p>Given the volume of growth proposed, it will be necessary to co-ordinate the delivery of development with the delivery of new utilities infrastructure.</p>	<p>Other stakeholders</p>	<p>Noted. The Council has been working closely with infrastructure providers and statutory bodies to ensure that the implications of the level of development proposed is fully understood with regard to infrastructure requirements.</p>
<p>The Local Plan should improve the mix of development in existing urban areas to include housing and employment to reduce the need to travel, thereby reducing congestion and pollution levels.</p>	<p>Residents</p>	<p>Sustainable development remains at the heart of national planning policy, namely within the NPPF, and this is reflected within the Proposed Submission Draft Local Plan. The Plan seeks to direct a mix of uses to the existing urban area and also to the proposed main development areas. Proposals for the Town Centre also seek to broaden the range of uses and introduce more residential units to improve sustainability. This is set out clearly in Policies TC1 (Town Centre and Surrounding Area), INF4 (Community Facilities), MD1 (Waterfront), MD2 (Garden Suburb), MD3 (South West Extension) and MD4 Peel Hall.</p>
<p>The value and importance of</p>	<p>Other stakeholders</p>	<p>The quality of agricultural land has been</p>



agricultural land should be considered.		assessed in developing the spatial strategy.
HS2 should be considered as part of the evidence base.	Other stakeholders	The proposed HS2 route has been considered in the drafting of the Proposed Submission Version Local Plan. The proposals in the Plan will not impact upon the proposed route.

## Theme 6: Plan Period

No of responses Part 1	28
No of responses Part 2	80
<b>Total</b>	<b>108</b>

### Overview

The issue of the Plan Period was raised by a number of residents, Borough Councillors, Parish Councillors and Parish Councils as well as a number of developers. Developer responses were predominately made at the first stage of regulation 18 consultation.

### Key Issues

A number of residents and Parish Councils considered that the proposed 20 year Plan period was too long and there was no obligation on the Council to exceed the 15 year Plan period set out in the NPPF. There were concerns that a 20 year Plan period was resulting in the need for additional Green Belt release. There were also concerns that there was too much uncertainty over Brexit, future development needs and likely technological change to plan for a 20 year period and that a shorter Plan period would enable the Council to assess whether major brownfield sites such as Fiddlers Ferry are able to come forward before committing to Green Belt release.

Conversely developers on the whole supported the proposed Plan period as an appropriate period in which to plan for Warrington's development needs.

### Conclusion

Having considered the representations, the Council intends to maintain the proposed Plan period running from 2017 to 2037. This meets the requirement of paragraph 22 of the NPPF for strategic policies to look ahead over a minimum of 15 years from the date of adoption of the Local Plan, on the assumption that the Plan is adopted in 2020, in accordance with the timetable in the Local Development Scheme (LDS).

The Council considers that a 20 year Plan Period enables the Council to plan more effectively to meet Warrington's long term development needs and consider more sustainable development options, including the proposed urban extensions. It will also ensure that the revised Green Belt boundaries are capable of enduring over the long term. The Plan will be kept under regular review to ensure that is able to respond to changes in circumstances.

A summary of all issues under this theme and the Council's response to them are set out below in Table 6.

Table 6: Plan Period - Issues and Responses

Issue	Respondent Type	Council Response
No legal basis for a 20 year Plan period. The NPPF recommends a 15 year Plan Period.	Residents, elected representatives	The new NPPF (2019) requires strategic policies to look ahead over a minimum of 15 years from the date of adoption of the Local Plan (para 22). The proposed plan period of 2017 to 2037 meets this requirement on the assumption that the Plan is adopted in 2020, in accordance

		with the timetable in the LDS.
<p>A 20 year plan period with a further 10 year period for considering development needs is too long. There is too much uncertainty around Brexit, future projections around population and jobs, HS2, HS3 and prospect of significant technological change. A shorter plan period would reduce the amount of Green Belt land required and enable greater certainty around whether additional brownfield development sites such as Fiddlers Ferry are able to come forward to meet longer term development needs.</p>	<p>Residents, elected representatives</p>	<p>The new NPPF (2019) requires that strategic policies look ahead over a minimum of 15 years from the date of adoption of the Local Plan. The proposed plan period of 2017 to 2037 meets this requirement on the assumption that the Plan is adopted in 2020, in accordance with the timetable in the LDS.</p> <p>The Council considers that a 20 year Plan Period enables the Council to plan more effectively to meet Warrington's long term development needs and consider more sustainable development options, including the proposed urban extensions. It will also ensure that the revised Green Belt boundaries are capable of enduring over the long term.</p> <p>The Plan will be kept under regular review to ensure that it is able to respond to changes in circumstances</p> <p>Development needs for a further ten years beyond the end of the Plan Period have been considered to ensure the permanence of revised Green Belt boundaries in the long term, in accordance with para 136 of the NPPF.</p> <p>The Council accepts that it is not appropriate to simply project forward development need calculations beyond the Plan Period. The Council has subsequently reviewed its evidence relating to the need for homes and employment land beyond the Plan Period, as well as its assumptions on likely future land supply. From this evidence, the Council has concluded there is no need to identify safeguarded land for future development.</p>
<p>Confirmation is required as to the precise plan period including the start date of the Plan.</p>	<p>Developers/agents</p>	<p>The Plan period is proposed to run from 2017 to 2037.</p>
<p>20 year Plan period is supported to meet long term development needs. It will also mitigate against any</p>	<p>Developers/agents</p>	<p>Support Noted.</p>

slippage to ensure a minimum period of 15 years post adoption.		
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## Theme 7: Capacity of the existing urban area to accommodate new development

No of responses Part 1	2
No of responses Part 2	359
<b>Total</b>	<b>361</b>

### Overview

There was a moderate level of response specifically to the issue of urban capacity, but it has consistently been identified as an issue within other themes. There were only a few responses in respect of this issue at the Regulation 18 (Part 1) consultation stage. Respondents predominantly commented at the Regulation 18 (Part 2) consultation stage. The vast majority of responses came from local residents. There were also responses from agents, Parish Councils, Parish Councillors and Ward Councillors.

### Key Issues

Residents, Parish Councils and Elected Members were concerned that the Plan had not given sufficient consideration to brownfield sites. There was a widespread view that not all brownfield sites had been identified and that densities were not being sufficiently maximised. By making better use of Brownfield sites it was considered that the amount of Green Belt land required to be released could be reduced. There was also a strong view that Green Belt sites should be released until all brownfield land had been developed.

Conversely, a number of developers considered that the Council had overestimated its urban capacity and questioned whether the Council was able to demonstrate that the sites identified through its masterplanning could be delivered within the Plan Period.

### Conclusion

Having considered all the representations received, and having regard to the various changes to the NPPF and the practice guidance at a national level which have come into force since the PDO consultation, the Council has re-assessed its housing land supply and produced an updated Urban Capacity Statement.

The Council is confident that the use of brownfield land is being maximised. However, it is not appropriate to insist that all brownfield land is developed before Green Belt can be released. Certain brownfield sites will not be able to come forward until later in the plan period due to the need for infrastructure to be delivered to support their development. The release of some Green Belt land early in the Plan period is necessary in order to help meet the requirement to identify a 5-year deliverable supply of housing land (para 67 of the NPPF).

A summary of all issues under this theme and the Council's response to them are set out below in Table 7.

Table 7: Capacity of the existing urban area to accommodate new development –Issues and Responses

Issue	Respondent Type	Council Response
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Support for development within the existing urban area.	Elected representatives	Support noted.
Concern regarding directing development towards the urban area and exacerbating urbanisation for those that live on the fringes.	Residents	The Council has sought to optimise development within the existing urban area to ensure that it can be supported by transport and social infrastructure.
Not all brownfield sites have been considered.	Residents	The Council have undertaken a detailed Urban Capacity Assessment that takes account of all available brownfield land both within the existing urban area and in the Green Belt. No new sites have been identified/promoted that have not been taken into account.
Development should be limited to the land set aside for housing under the New Town plans.	Residents	The Council have a statutory duty to prepare and keep up-to-date a development plan. Paragraph 11 of the NPPF requires that Plans should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless there are strong reason(s) for not doing so, which would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. In order to meet the Council's OAN's the evidence indicates that there is a requirement to utilise more land that was envisaged by the New Town Corporation.

<p>Brownfield land should be developed before Green Belt. There is enough brownfield land in the borough to build 15,000 houses.</p>	<p>Residents, elected representatives</p>	<p>Government policy (NPPF - Paragraphs 117 – 123: Making effective use of land) requires local planning authorities to maximise the use of sites within the existing urban area. However, it is not appropriate to require all brownfield land to be developed before any Green Belt is released. Certain brownfield sites will not be able to come forward until later in the plan period due to the need for infrastructure to be delivered to support their development. The release of some Green Belt land early in the Plan period is necessary in order to help meet the requirement to identify a 5-year deliverable supply of housing land (para 67 of the NPPF).</p>
<p>Incentives should be put in place to encourage developers to use brownfield sites.</p>	<p>Residents</p>	<p>The Council is working proactively to ensure brownfield sites are developed through prioritising infrastructure to unlock brownfield sites. The Council also has a lower affordable housing policy requirement for brownfield sites reflecting the viability issues that often hold such development back.</p>
<p>Proposed development is disproportionate in the villages.</p>	<p>Residents, elected representatives</p>	<p>In arriving at the PDO the Council undertook a detailed assessment of the options for distribution the level of proposed growth. This process included an assessment of a range of factors, including; the level of services and character of the existing villages.</p>
<p>40 dwellings/hectare should be adjusted for the proposed development in urban areas.</p>	<p>Residents</p>	<p>The housing density assumptions in the PDO documentation are not restricted to 40dph. In any event the housing density assumptions in the updated Urban Capacity work (ie. SHLAA and Master planning work) have been revised further to take account of the location of proposed development. Housing density assumptions range from 30dph to 275dph.</p>

<p>No consideration of brownfield sites that will emerge over the plan period.</p>	<p>Residents</p>	<p>The Council have undertaken a detailed Urban Capacity Assessment that takes account of all available brownfield land both within the existing urban area and in the Green Belt. This includes all brownfield land that it is considered will be available within the plan period.</p>
<p>Warrington doesn't have the capacity for 24,000 homes. Warrington will reach saturation point.</p>	<p>Residents</p>	<p>Since the PDO Consultation the Council's housing requirement has been re-assessed in an updated LHNA using the Standard Housing Methodology that has been introduced by Government. Policy DEV1 of the of the Proposed Submission Version Local Plan indicates a minimum of 18,900 new homes will be delivered to meet Warrington's housing needs over the 20 year Plan period from 2017 to 2037.</p>
<p>Houses need to be distributed across the borough.</p>	<p>Residents</p>	<p>The Spatial Strategy for the Proposed Submission Version Local Plan shows how the Local Plan will accommodate and manage development in different locations across the Borough in accordance with the Plan's vision and objectives. The strategy has emerged following consideration of a range of alternative options. It has been informed by the sites submitted by developers and landowners as part of the Local Plan 'call for sites' and the representations made to the Local Plan Scoping and Preferred Development Option consultations. It has been informed by both planned infrastructure investment and also by the ability to deliver new and improved infrastructure to support new development and the growth of Warrington as a whole.</p>
<p>Building thousands of houses in the south of the borough around the rural villages will mean the best parts of</p>	<p>Residents, elected representatives</p>	<p>The development strategy which underpins the Proposed Submission Version Local Plan takes a brownfield first approach which seeks to direct development</p>



Warrington are lost.		to the existing urban area in the first instance. Using demographic and economic forecasts the Council has determined that there is insufficient capacity within the main urban area and existing settlements to deliver the necessary development
North and eastern Warrington are barely touched by the proposals.	Residents, elected representatives	Warrington will need over the next 20 year period. As a result, some Green Belt land will need to be released for development. A detailed process of strategic spatial options and site assessments has been undertaken to identify the most sustainable locations for new development.  Further detail on the spatial options process and the level of development proposed for south Warrington is provided under separate themes within this report.

## Theme 8: Land Supply to meet Warrington’s development needs

No of responses Part 1	36
No of responses Part 2	48
<b>Total</b>	<b>84</b>

### Overview

There was only a moderate level of response in relation to the level of land supply. This may be because assessing the level of land supply is a relatively technical issue. The more detailed responses came from developers and agents. Developers, landowners, Parish Councils and agents predominantly responded to the Regulation 18 (Part 1) consultation, whilst local residents predominantly responded at the Regulation 18 (Part 2) consultation stage.

### Key Issues

Respondents generally commented on the supply of brownfield land and outlined it as a more suitable source for development in preference to the use of Green Belt. There was both support and concerns expressed regarding the urban capacity identified in the published Urban Capacity Statement. A number of concerns were expressed about the assumptions in the SHLAA and associated Master Planning work, in particular regarding: the Windfall Allowance, density assumptions, viability and the deliverability of sites. Some of these issues have also been considered under the earlier theme of ‘Urban Capacity’.

Concerns were also expressed about the unsuitability of development in the south (resulting in the loss of Green Belt, loss of natural beauty and wildlife, its location away from amenities and the need for large infrastructure development to support it); the PDO’s bias towards developers preference for sites; the impact of Brexit on land supply; the need for a higher density of housing development in the town centre and suggestions of alternative areas of supply).

### Conclusion

Having considered all the representations received, and having regard to the various changes to the NPPF and the practice guidance at a national level which have come into force since the PDO consultation, the Council has re-assessed its housing land supply and produced an updated Urban Capacity Statement.

The Council is confident that the use of brownfield land is being maximised.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 8.

Table 8: Land Supply to meet Warrington’s development needs – Issues and Responses

Issue	Respondent Type	Council Response
The quantity of brownfield land available has been under estimated.	Residents	The SHLAA and Master Planning work that the Council have undertaken has been updated since the consultation of the PDO and provides a comprehensive assessment of the available land in the Borough.

<p>Brownfield land should be used first before Green Belt. There is enough space for 15,000 homes on Brownfield land.</p>	<p>Residents, elected representatives, other stakeholders</p>	<p>Government policy (NPPF - Paragraphs 117 – 123: Making effective use of land) requires local planning authorities to maximise the use of sites within the existing urban area.</p> <p>However, it is not appropriate to insist that all brownfield land is developed before Green Belt can be released. Certain brownfield sites will not be able to come forward until later in the plan period due to the need for infrastructure to be delivered to support their development. The release of some Green Belt land early in the Plan period is necessary in order to help meet the requirement to identify a 5-year deliverable supply of housing land (para 67 of the NPPF).</p>
<p>The Council is making an over provision for windfall allowance in calculating the housing land supply within the existing urban areas of the Borough. Paragraph 48 of NPPF (2012 Version) states that an allowance for windfall sites can be made in the five-year supply if the local authority has compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply.</p>	<p>Developers/agents</p>	<p>There is no provision for windfall allowance in the calculation of the housing supply contained in the SHLAA. This was removed in 2017 and replaced with a Small Sites Allowance. The justification for this is outlined in the SHLAA (2018)</p>
<p>The inclusion of a windfall allowance of 64 dpa from Years 1 to 15, is unusual as it is normal practice to remove Years 1 to 3 from a windfall allowance to avoid double-counting of permissions on small sites. The comment in the Urban Capacity Study paragraph 1.12 alludes to double-counting but in reference to not counting permissions post 31st March 2016. But this is not the same</p>	<p>Developers/agents</p>	<p>There is no provision for windfall allowance in the calculation of the housing supply contained in the SHLAA. This was removed in 2017 and replaced with a Small Sites Allowance. The justification for this is outlined in the SHLAA (2018).</p> <p>The land supply calculate has considered completions in 2017/18 representing the first year of the Plan Period.</p>

<p>as double—counting an allowance for years 1 to 3 when existing permissions granted up to 31st March 2016 will be delivered and are already accounted for. It is considered 192 units should be discounted.</p>		
<p>The supply of employment land identified in the Economic Development Needs Study is not robust.</p>	<p>Developers/agents</p>	<p>The Council has carried out a comprehensive re-assessment of its employment land supply through an updated to its Economic Development Needs Assessment.</p>
<p>The land supply assessment takes an over-optimistic approach to delivery and is not informed by an up-to-date viability assessment. The Council’s latest published Viability Assessment is dated Sept 2010 and is now very out of date. This should be updated and used to inform deliverability as well as informing the provision of affordable housing in the borough.</p>	<p>Developers/agents</p>	<p>The Proposed Submission Version Local Plan is supported by an up to date Local Plan Viability Assessment, published as a supporting evidence base document.</p>
<p>The Council’s estimated land supply (Urban capacity) is unrealistically high. Experience shows that not all the SHLAA sites will transpire into delivery on the ground. Some will not come forward for a variety of reason (ie. financial viability, land ownership, business continuity). There is no allowance for the inevitable proportion of sites that do not come forward (a “non-implementation” allowance).</p>	<p>Developers/agents</p>	<p>The SHLAA and Master Planning work that the Council have undertaken has been updated since the consultation of the PDO. The assumptions in the SHLAA (Build Rates; Lead-in-times; Densities etc) are re-appraised annually to ensure that they up-to-date and take account of recent fluctuations in market conditions. Whilst, it is acknowledged that a specific allowance is not made for the non-delivery/implementation of sites/permissions in the SHLAA, this is because the deliverability of every site is reassessed annually and up-dated. A limited number of sites have now been removed from the Council’s calculation of urban capacity within the Plan period. The land supply calculation also includes a flexibility factor of 10%.</p>
<p>There are significant reservations about the urban capacity and specifically the town centre in meeting the proposed level of dwellings required in the plan period.</p>	<p>Developers/agents, residents</p>	

<p>There is a lack of critical analysis of the sites within the SHLAA anticipated to come forward for development.</p>	<p>Developers/agents</p>	<p>The SHLAA is produced in accordance with the Government guidance contained in the latest Planning Practice Guidance. Each site is re-appraised annually and the assessment takes account of comments from stakeholders, developers, internal/external consultees and any other relevant information.</p>
<p>Even under the most optimistic assumptions and using the lowest housing OAN, WBC cannot demonstrate a defensible five year housing land supply. There has been a shortfall in the number of new dwellings provided during the period 2014-2016 in the order of 1,282 dwellings (against a target of 1,000 dpa).</p>	<p>Developers/agents</p>	<p>The standard housing methodology takes account of historic back log. The Local Plan housing target is in excess of the minimum requirement under the standard housing methodology and therefore any historic under delivery will be addressed in the Local Plan.</p>
<p>General support for the Council's assessment of Urban Capacity and the conclusion that Green Belt land will need to be released.</p>	<p>Developers/agents</p>	<p>Support noted.</p>
<p>The proximity to existing UU Wastewater Treatment Works (WwTW) should be considered when assessing the suitability of sites. WwTWs can produce emissions which include odour and noise. New additional sensitive receptors should not be introduced near to an existing treatment works.</p>	<p>Other stakeholders</p>	<p>All the utility providers, including United Utilities, have been consulted and input has been provided into the site allocation process for the Proposed Submission Version Local Plan.</p>
<p>If an allowance is included within the Local Plan Review for further urban development, it will be necessary to found this on very clear and robust evidence of land availability, achievability, suitability and, very importantly, viability. A very cautious approach should be taken to land supply from this source to reflect the risks inherent in delivering housing on PDL.</p>	<p>Developers/agents</p>	<p>Support for the general approach to calculating the land supply is noted. The SHLAA and Master Planning work that the Council have undertaken has been updated since the consultation on the PDO and takes account of comments from stakeholders, developers, internal/external consultees and other relevant information. In addition, the SHLAA includes a review of past projections comparing projected</p>

<p>The consideration of land supply available in the urban area and green field sites outside of the Green Belt is considered an appropriate place for the review of land supply to begin, and this approach is supported by our clients.</p> <p>There is the possibility that some sites identified within the land supply assessment may not be deliverable, or may not come forward within the anticipated timescales, and as such, more sites should be identified within the land supply for the Plan period where possible.</p>	<p>Developers/agents</p>	<p>completions with actual completions that occurred in a given year (2018 SHLAA). This illustrates that the actual completions continually exceed the projected completions, which serves to demonstrate the cautious approach inherent in the assumptions within the SHLAA.</p> <p>The Local Plan land supply calculation also includes a 'flexibility factor' of 10%</p>
<p>Development of the Green Belt in the south is not sustainable. It would be more sustainable to develop in the town centre so people would have access to amenities.</p>	<p>Residents</p>	<p>The Master Planning work that has been undertaken incorporates the Council's vision for the regeneration of the areas in and around the Town Centre and seeks to maximise its development potential.</p> <p>The Council's response to development in south Warrington is provided later in this report.</p>
<p>In the PDO there is no consideration of sites that could be supplied later as they become available in the plan period such as Fiddlers Ferry Power Station (FFPS), Warrington Hospital and Stretton Air Strip.</p>	<p>Residents</p>	<p>The updated Urban Capacity Statement (2019) takes account of all available sites within the Plan period. The Council has consulted with all of the major land owners/businesses.</p> <p>The Warrington Hospital site may not be available in the Plan Period. The operators of FFPS have indicated that the power station is likely to continue operating into the next decade and that the existing ash processing activities at the site are expected to continue beyond the power station's life span, until the existing deposits are fully depleted. Therefore, there is not currently sufficient certainty for the site be included within the Council's developable</p>

		<p>employment land supply.</p> <p>These sites have however been taken into account in the Council's decision not to 'safeguard' land for development beyond the plan period.</p>
<p>There is a reliance on large strategic sites that require significant enabling infrastructure to deliver housing numbers in early/mid years of the Plan which is unrealistic.</p>	<p>Developers/agents</p>	<p>Since the PDO consultation, the housing trajectory has been revised to take account of the anticipated delivery of major infrastructure in the strategic allocations and this been taken into consideration in the drafting of the housing delivery Policy DEV1 and the strategic site allocation Policies MD1 to MD4 of the Proposed Submission Version Local Plan.</p> <p>The Council is proposing a 'stepped housing trajectory' in recognition of the proportion of the land supply arising from strategic sites. There is no reliance on large strategic sites to deliver any housing in the early (0-5) years of the Plan.</p>
<p>Land supply is not in the best interest of residents. The call for sites supply has been wholly biased towards Green Belt and developer induced proposals.</p>	<p>Residents</p>	<p>The Council have undertaken a detailed Urban Capacity Assessment that takes account of all available brownfield land both within the existing urban area and in the Green Belt. Although the majority of sites promoted through the Call for Sites exercise were Green Belt, the Plan's land supply comprises approximately 2/3 brownfield land.</p>
<p>The PDO sees the release of all the land from Green Belt immediately, rather than utilising alternatives first. Green Belt should only be used when circumstances become exceptional.</p>	<p>Residents, elected representatives</p>	<p>It is not appropriate to insist that all brownfield land is developed before Green Belt can be released. Certain brownfield sites will not be able to come forward until later in the plan period due to the need for infrastructure to be delivered to support their development. The release of some Green Belt land early in the Plan period is necessary in order to help meet the requirement to identify a 5-</p>

		year deliverable supply of housing land (para 67 of the NPPF).
There are 1000 homes in Warrington advertised for sale or rent in the Warrington area that could be used for housing without causing destruction.	Residents	There will always be turnover in the housing market as people look to sell and move house. It would be inappropriate to include this element in the supply.
There should be an independent study on brownfield supply.	Residents	The Council's Urban Capacity Assessment provides a robust assessment of the available supply of brownfield land.
Housing density of 30 dph throughout the PDO is questionable. Achieving a higher housing density in the town centre (e.g. 40dph) could mean a lower density could be achieved elsewhere and minimise the impact on the Green Belt.	Residents, elected representatives	The housing density assumptions in the PDO documentation are not restricted to 30dph. In any event the housing density assumptions in the updated Urban Capacity work (ie. SHLAA and Master planning work) have been revised further to take account of the location of proposed development. Housing density assumptions range from 30dph to 275dph.
The backlog of 847 homes must be applied to the housing requirement for the first 5 years of the Plan period. It is also important to note that this shortfall figure may increase prior to the adoption of the Plan.	Developers/agents	The standard housing methodology takes account of historic back log. The Local Plan housing target is in excess of the minimum requirement under the standard housing methodology and therefore any historic under delivery will be addressed in the Local Plan.
The backlog should be calculated using the housing requirement figure of 1,113 DPA, which is therefore 1,163 since 2015.	Developers/agents	The standard housing methodology takes account of historic back log. The Local Plan housing target is in excess of the minimum requirement under the standard housing methodology and therefore any historic under delivery will be addressed in the Local Plan.
A flexibility allowance of at least 20% should be built into the Local Plan. This approach would give a reasonable degree of security that should sites not deliver at the rates anticipated, a 5-year housing land supply could still be maintained (Reference made to "Local Plan	Developers/agents	The Council has increased its 'land flexibility' to 10%, which it considers provides sufficient flexibility in the context of the Plan's proposed housing land supply. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.



<p>Expert Group Report, Mar 2016.</p>		
<p>There is too much reliance on 3 large growth areas to deliver plan requirements. The balance trajectory is required to include small sites and ready sites, to deliver in first 5 years will provide greater flexibility.</p>	<p>Developers/agents</p>	<p>The major urban extensions are considered to represent the most sustainable option for meeting Warrington’s long term development needs, combined with a spatial strategy which seeks to optimise the potential of the existing urban area and incremental growth in the outlying settlements.</p> <p>The Council accepts that the need to release Green Belt land and the lead in times for the major infrastructure required to support the major development sites means that there will be a relatively lower level of housing delivery for the first 5 years of the Plan Period.</p> <p>The Council is therefore proposing a Stepped Housing Trajectory. Government planning guidance recognises that such an approach is appropriate where strategic sites such as those being proposed by the Council will have a phased delivery or are likely to be delivered later in the plan period (PPG Housing and Economic Land Availability Assessment para 34).</p>
<p>A proportion of dwellings with site in SWEU (potentially up to 100) could be brought forward within years 0-5 of the Local Plan period on the land north of Chester Road site.</p>	<p>Developers/agents</p>	<p>The Local Plan allocation policy confirms that development for this site can only come forward once the funding and programme for the Western Link has been confirmed. The Council does not consider this will enable development on the site within the first five years of the Plan.</p>
<p>Greater flexibility is required through the identification of a varied portfolio of additional sites specifically orientated to areas away from the South and towards Central Warrington and its urban areas to boost</p>	<p>Developers/agents</p>	<p>The major urban extensions are considered to represent the most sustainable option for meeting Warrington’s long term development needs, combined with a spatial strategy which seeks to optimise the potential of the</p>

<p>delivery and promote market choice.</p>		<p>existing urban area and incremental growth in the outlying settlements.</p>
<p>Do not understand why 5% flexibility factor is necessary. This should be taken out and housing numbers reduced.</p>	<p>Residents</p>	<p>It is necessary to include provision for flexibility on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward.</p> <p>In response to representations made during the PDO consultation, the Council has used a benchmark of 10% which it considers provides sufficient flexibility in the context of the Plan's proposed housing land supply. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.</p>
<p>Most housing delivery will need to take place from year 5-15 to allow relevant infrastructure to be delivered. The development trajectory is a sensible reflection of this.</p>	<p>Developers/agents</p>	<p>Noted.</p>

## Theme 9: Use of Masterplans

No of responses Part 1	1
No of responses Part 2	22
<b>Total</b>	<b>23</b>

### Overview

The issue of the use of masterplans was only raised by a small number of respondents. Responses were predominantly from residents with a few from developers and one from a stakeholder. Responses were predominately made at the second stage of regulation 18 consultation.

### Key Issues

Whilst, respondents generally supported the principle of maximising the use of land within the urban area there were concerns regarding the uncertainty that the use of masterplans provided.

Responses generally called for: greater involvement of the community in the development of the plans, a plan that is more accessible and easier to understand, more detail on phasing of the delivery of the plan, more detail on the proposed infrastructure in the masterplan, the desire for evidence of independent scrutiny of the plan; the Town Centre Masterplanning is not realistic; fails to take appropriate account of the existing established uses and gives no consideration to the realities and complexities on the ground, including the numerous different land ownerships and the restraints of the development of land.

### Conclusion

Having considered the representations, the Council has reviewed in detail the Masterplanning work that was undertaken prior to the PDO consultation and revised capacities for development parcels have been provided where appropriate. A revised Urban Capacity Statement has been provided that takes account of the updated Masterplanning work and this has been reflected in the overall housing distribution and trajectory in Policy DEV1 and the site specific allocation Policies (MD1 to MD4) in the Proposed Submission Version Local Plan.

A summary of all issues under this theme and the Council's response to them are set out below in Table 9.

Table 9: Use of Masterplans –Issues and Responses

Issue	Respondent Type	Council Response
The PDO should be easier to understand (eg. in terms of language used and clarity in figures used so it is accessible to everyone).	Residents	Comments noted and taken into account in the preparation of the Proposed Submission Version Local Plan.
There is uncertainty about the phasing of sites identified in the Masterplans. There needs to be a timeline for	Other stakeholders	Since the PDO consultation the phasing of development has been considered in detail as part of the masterplanning process, not only in relation to road infrastructure

the proposed development.		but also in terms of bringing forward both residential and employment land at appropriate rates. This has been reflected in the site specific allocation Policies (MD1 to MD4) in the Proposed Submission Version Local Plan.
Concern that the master planning process does not provide a holistic approach and will end up as a piecemeal concept that fails to deliver infrastructure.	Residents	
The new local development plan undermines existing neighbourhood plans.	Residents	The Council has fully considered Neighbourhood Plans in the preparation of the Proposed Submission Draft Local Plan. However this must be weighed with requirements of central government guidance, including ensuring that Warrington as a whole meets its future overall development needs.
Warrington Town Centre, Inner Warrington and Waterfront Strategic Development Opportunity - the Council has only produced a draft masterplan on which to base the assumption around increased yields from these sites.	Developers/agents	Since the PDO consultation the density of development has been reviewed in detail as part of the masterplanning process. Revised capacities for development parcels have been provided where appropriate and these have been reflected in the overall housing distribution and trajectory in Policy DEV1 and the site specific allocation Policies (MD1 to MD4) in the Proposed Submission Version Local Plan. A revised Urban Capacity Statement and supporting Masterplanning work has been provided that is easier to understand.
The Town centre Masterplanning does not relate directly to the sites identified in the SHLAA and it is not clear where each 'masterplan area' as identified in Table 1 of the Council's Urban Capacity Statement document is located within the wider masterplan area.	Developers/agents	
The residents have not been involved in the development of the proposals. The proposal appears to be produced in association with companies and developers.	Residents	The masterplans have been prepared to demonstrate the capacity of the existing urban area and to illustrate how future development in the strategic allocation sites may come forward. They have been reviewed following the response to the PDO consultation. The allocation

		policies for the Main Development Areas required further public consultation on the masterplans are they are progressed in more detail.
There has been no independent scrutiny of the PDO.	Residents	The PDO and supporting masterplanning work has been approved by elected members and subject to scrutiny through the consultation process. The Local Plan will be subject to an Examination in Public held by an Independent Inspector.
Town Centre Masterplan proposes housing on virtually all employment and significant retail sites. This is unrealistic. It does not take account of major constraints such as flood risk zones. The masterplan should have shown and worked with the boundaries of SHLAA sites. Not all these sites will be deliverable.	Developers/agents	Since the PDO consultation, the Town Centre Masterplanning has been updated to take account of responses and the latest evidence from landowners and statutory consultees. It is not feasible for the Masterplanning work for the TC to work within the boundaries of the SHLAA sites. The two are not necessarily compatible. The SHLAA and Master Planning work that the Council have undertaken has been comprehensively updated since the consultation of the PDO and provides a complete and realistic assessment of the developable and deliverable supply of land in the Borough.
The masterplan which the council indicate will form part of the evidence base for the local plan is unrealistic and presents aspirations which are not deliverable.	Developers/agents	
The Masterplan identified the Sainsbury's Church Street site as part of the Eastern Gateway area. It identifies the area for a comprehensive redevelopment, predominantly to accommodate residential uses. The Masterplan fails to take appropriate account of the existing established uses The master plan gives no consideration to the realities and complexities on the ground, including the numerous different	Developers/agents, Neighbouring Councils	Since the PDO consultation, the Town Centre Masterplanning has been updated to take account of the response and Parcels E3 to 38 and E14 to E16 have been shown as not delivering any residential development.

land ownerships and the restraints of the development of land.		
Support for the masterplanning of the town centre, Inner Warrington and the Waterfront, which have sought to maximise the capacity of the urban area.	Developers/agents	Support noted.
The Masterplan Concept Document for the SWUE is very unclear in terms of its treatment of the TPT.	Residents	Since the PDO consultation, a comprehensive review of the responses has been undertaken and a range of transport measures is proposed as part of the delivery of the proposed allocations in the Local Plan to reduce reliance upon the car.
A key principle of the garden city movement is that all uses are incorporated and connected and that there is strong green infrastructure. The approach of the concept plan of assuming a 20 dwelling per gross hectare density is supported as this will reflect the principles of the Garden City Suburb.	Developers/agents	Support noted.

## Theme 10: Build rates and delivery assumptions

No of responses Part 1	0
No of responses Part 2	41
<b>Total</b>	<b>41</b>

### **Overview**

There was a fairly low level of response in respect of the build rate and deliverability assumptions. Responses were predominantly from agents and developers with only a few coming from residents and one from a Parish Council. This may be because the calculating of build rates and the use deliverability assumptions is a relatively technical concept. All the responses on this issue came at the second stage of the regulation 18 consultation.

### **Key Issues**

Responses generally commented on the deliverability of the plan and how realistic it was to deliver the amount of housing in the location proposed, with the required infrastructure and employment provision in place.

Responses generally outlined views on how the delivery rates are considered to be unrealistically high, the need for more clarification on what will be built over the years, how Brexit will cause uncertainty to development and its potential impact on deliverability, concerns that infrastructure/employment will not keep up with the rate of development and concerns on the deliverability of the proposed location of housing in the south with it being Green Belt and away from the town centre amenities.

### **Conclusion**

Given the nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base that underpins the Proposed Submission Version Local Plan.

The Council has re-assessed its housing land supply; the assumptions on which it is based and produced an updated Urban Capacity Statement.

The Council are confident that the assumptions used to support the housing land supply assessment are robust. The assumptions contained in the SHLAA are based on evidence of past rates in Warrington, which are updated every year and so are evidenced and locally specific.

The Council acknowledges that there are longer lead-in times associated with large strategic sites/urban extensions and has worked with developers to ensure that the build rates and other deliverability assumptions are realistic, robust and specific to the sites.

A summary of all issues under this theme and the Council's response to them are set out below in Table 10.

Table 10: Build rates and delivery assumptions –Issues and Responses

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
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<p>The PDO contains unrealistic delivery rates.</p>	<p>Developers/agents</p>	<p>The delivery rates have been adjusted and are based on analysis of recent completion rates and consultation with stakeholders.</p>
<p>There remain optimistic and unjustified lead-in times and build-rates, in terms of past rates identified in the SHLAA (Appendix 4) and there does not appear to be allowance for demolitions or clearance based upon historic trend.</p>	<p>Residents, developers/agents</p>	<p>The lead-in-times and build rates contained in the SHLAA are based on evidence of past rates in Warrington. Any demolition/clearance is taken account of in the lead-in-times. These are updated every year and so are evidenced and locally specific.</p> <p>The Council has given detailed consideration to the build rates proposed for the Garden Suburb in consultation with developers proposing sites in this area. As a consequence build rates in this area have been reduce to a more realistic level.</p>
<p>Support for the consideration of individual site circumstances in relation to delivery rates. However, disagree with some of the assumptions made regarding standard delivery rates. A delivery rate of 20 dpa on sites of less than 50 dwellings is considered to be too high - 15 dpa on sites between 30-50 units is considered more reasonable. A separate category should be created for sites of less than 20 units where delivery is likely to be slower. The sites should be further broken down into 51-100 units with a build rate of 25 dpa and 101-250 units with a build rate of 30-35 dpa. On sites of between 250 and 500 units, delivery of 55 dpa should only be considered appropriate</p>	<p>Developers/agents</p>	<p>Support noted. In addition, comments regarding the standard delivery rates are noted. However it is considered that the standard deliver rates used in the SHLAA are robust and it should be noted that where developers and landowners have provided specific information relating to these matters and other influences such as densities, this is taken into account in the development forecasting for those particular sites. This is acknowledged in the SHLAA report and the density/delivery rates/net developable area assumptions are reviewed annually.</p>



where there are at least 2 developers. Support for the build rate of 30 dpa on Green Belt sites.		
Lead-in times - challenge the 'one size fits all' approach. Allowance should be made for larger sites to come forward at a slower pace (adding 6 months onto the timeframes proposed by WBC). Concerns regarding the application of standard lead in times for sites without planning permission. (Reference made to research undertaken by Nathaniel Lichfield & Partners published in Nov 2016 - "Start to Finish - How quickly do large-scale housing sites deliver?").	Developers/agents	The lead-in-times contained in the SHLAA are based on evidence of past rates in Warrington. These are updated every year and so are evidenced and locally specific. The SHLAA report acknowledges that where developers and landowners have provided specific information relating to these matters and other influences such as phasing, this is taken into account in the development forecasting for those particular sites.
Construction rates are slowing due to the uncertainty of Brexit. This has not been taken into account.	Residents	The build rates used in the 2018 SHLAA and updated Master Planning work that inform the housing trajectory are based on analysis of recent completion rates and consultation with stakeholders.
There is an assumption that all sites that benefit from planning permissions will be developed. This does not happen in practice and as such a deduction should be made to the supply to account for non-implementation rates (ie. Lapse Rate).	Developers/agents	The SHLAA is updated annually to take account of lapsed planning permissions.
Windfall allowance is too high. It does not taken into account the possibility that windfall sites may already been included within the supply as planning consents. To prevent the possibility of double	Developers/agents	The SHLAA has not contained a Windfall Allowance since 2016. Instead it contains a Small Sites Allowance which is based on historic completion information from sites below 0.25ha. This is adjusted annually to take account of completions over the last 10 years.

<p>counting, windfall delivery should be removed from the first 3 years. In addition, the windfall delivery data is heavily skewed by three years.</p>		
<p>The Small Sites Allowance (SSA) is too high. It does not take into account the possibility that windfall sites may already been included within the supply as planning consents. The inclusion of a SSA in the first five years has the potential for double counting.</p>	<p>Developers/agents</p>	<p>The SSA is based on historic completion information from the SHLAA. The allowance is based on an average of the last ten years, which covers a range of economic conditions.</p> <p>Completions from 2017/18 have been separately recorded in the development trajectory and no small sites allowance has been applied to this year to avoid any double counting.</p>
<p>The assumptions made in the SHLAA in relation to net developable area may be challenging (75% net developable area is identified whereas on some larger strategic allocations this may drop to around 50%).</p>	<p>Developers/agents</p>	<p>It is acknowledged that the net developable area ratios for large strategic sites may be different. The proposed capacities of the Strategic allocations are site specific and are based on engagement with the developers and delivery partners.</p>
<p>Delivery rates for the Waterfront are questioned due to reliance on delivery of Western Link Road, which is not certain.</p>	<p>Developers/agents</p>	<p>It is acknowledged that the development of the Waterfront is reliant upon the delivery of the Western Link and Policy MD1 of the Proposed Submission Version Local Plan specifically precludes any development until funding has been secured and a programme of construction has been confirmed. Since the PDO consultation, the housing trajectory has been revised to remove any delivery from the 5-year deliverable supply. The lead in time is based on the most up to date programme for the construction of the Western Link.</p>
<p>As the plan is over a 20 year period it is likely to result in developers banking land for maximum profit.</p>	<p>Residents</p>	<p>The Council has only identified sites which it considers will be developed during the Plan Period.</p>

<p>Brownfield land should be developed before Green Belt.</p>	<p>Residents</p>	<p>it is not appropriate to insist that all brownfield land is developed before Green Belt can be released. Certain brownfield sites will not be able to come forward until later in the plan period due to the need for infrastructure to be delivered to support their development. The release of some Green Belt land early in the Plan period is necessary in order to help meet the requirement to identify a 5-year deliverable supply of housing land (para 67 of the NPPF).</p>
<p>Housing density of 30dph throughout the PDO is questionable. Achieving a higher housing density in the town centre (e.g. 40dph) could mean a lower density could be achieved elsewhere and minimise the impact on the Green Belt.</p>	<p>Residents, developers/agents</p>	<p>The housing density assumptions in the PDO documentation are not restricted to 30dph. In any event the housing density assumptions in the updated Urban Capacity work (ie. SHLAA and Master planning work) have been revised further to take account of the location of proposed development. Housing density assumptions range from 30dph to 275dph.</p>
<p>There is too much emphasis and reliance on the urban capacity which will put the delivery of the identified scale of housing over the plan period at risk.</p>	<p>Developers/agents</p>	<p>Government policy (NPPF - Paragraphs 117 – 123: Making effective use of land) requires local planning authorities to maximise the use of sites within the existing urban area. The SHLAA and Master Planning work that the Council have undertaken has been updated since the consultation on the PDO and takes account of comments from stakeholders, developers, internal/external consultees and other relevant information. In addition, the SHLAA includes a review of past projections comparing projected completions with actual completions that occurred in a given year (Table 3.8, 2018 SHLAA). This illustrates that the actual completions continually exceed the projected completions, which serves to demonstrate the cautious approach inherent in the</p>

		assumptions within the SHLAA.
Significant infrastructure will be required to be delivered along with the developed areas.	Residents, developers/agents	It is acknowledged that the Proposed Submission Version Local Plan will require the delivery of significant amounts of infrastructure. In order to support the strategic allocations the Council has liaised closely with both internal service providers and statutory bodies (such as Highways England and the utility providers) to understand the levels of infrastructure that will be required. The site allocation policies (MD1 to MD4 and OS1 to OS9) identify the quantity and phasing of the key infrastructure required to enable each allocation.
Will enough employment opportunities be built along with the new housing?	Residents	The Economic Development Needs Assessment (2018) has identified a need for 362 hectares of employment land up to 2037. Policy DEV1 of the Proposed Submission Version Local Plan identifies the sites that are proposed to be allocated to meet this need.
Concern that the delivery rates will not be achieved due to the location of the majority of the housing in one part of the borough (i.e. south) and that this will create over supply in the area.	Developers/agents	The Proposed Submission Version Local Plan distributes development across the borough. There will still be significant development within the existing urban area, particularly in the central area and the north. The development will be phased to ensure that it is delivered in tandem with the necessary infrastructure and so as not to flood the market in any particular area and has been agreed with developers and site promoters.
Support for predicted delivery within 3 to 5 year period (subject to planning) of John Street scheme.	Developers/agents	Support noted.
Support variable developable area ratios.	Developers/agents	Support noted.

**Theme 11: Future of Fiddlers Ferry Power Station**

No of responses Regulation 18 (Part 1)	<b>0</b>
No of responses Regulation 18 (Part 2)	<b>271</b>
Total	<b>271</b>

**Overview**

A number of respondents, including Parish Councils and Councillors, Ward Councillors, residents, Agents, Landowners, Stakeholders and statutory Consultees raised the issue of Fiddlers Ferry as part of the Regulation 18 consultations.

**Key Issues**

A large number of respondents believed that the Power Station would cease operation in the Plan period and therefore represents a major brownfield site capable of accommodating a substantial number of new homes. This would in turn reduce the requirement to release Green Belt.

The operator stressed the unique locational characteristics of the site supported its long term use for power generation, but that a modern power station would require a much smaller area of the existing site and therefore it could provide additional land for meeting Warrington’s future employment needs.

**Conclusion**

The Council is aware that while Fiddlers Ferry power station is likely to continue operating into the next decade, Government energy policy is putting pressure on cessation of coal power by 2025. The site may therefore come forward for development and represents a major future brownfield redevelopment opportunity.

The site is ideally suited to power generation, being connected to the National Grid with supporting infrastructure on-site, having rail and road transport links, benefiting from a supply of cooling water and having a skilled workforce. Were a new power plant to come forward at the site in the future, this is likely to have a much smaller footprint than the existing Power Station, potentially freeing up land for power-related and other employment development.

The decommissioning and demolition of the existing Power Station will however take a number of years to complete. There is not currently therefore sufficient certainty for the site be included within the Council’s developable employment land supply, but given the scale of the site, this will need to be kept under review.

The likelihood of the site coming forward at some point in the future does however mean that the Council is confident it will have sufficient employment land to meeting Warrington’s needs well beyond the end of the Plan Period and ‘safeguarding’ of additional land for employment development is not required.

Given the operator’s intension to maintain power generation on the site, issues of potential land contamination and the importance of ensuring future development is consistent with Halton’s plans for the wider Widnes Waterfront area, the Council does not consider that residential development would be appropriate on the site.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 11.

**Table 11: Future of Fiddlers Ferry Power Station – Issues and Responses**

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
Fiddlers Ferry will be decommissioned within the 20 year Plan period. The site provides an opportunity to develop brownfield land for housing, however there is not any mention of it meeting the proposed housing needs within the next 20 years of the Plan.	Elected representatives, Residents	The Council is aware that while Fiddlers Ferry power station is likely to continue operating into the next decade, Government energy policy is putting pressure on the cessation of coal power by 2025. The site may therefore come forward for development and does represent a major future brownfield redevelopment opportunity. However, the owners of the site have indicated that the site would be developed for new employment uses.  Given the operator’s intension to maintain power generation on the site, issues of potential land contamination and the importance of ensuring future development is consistent with Halton’s plans for the wider Widnes Waterfront area, the Council does not consider that residential development would be appropriate on the site.
A shorter Plan period would allow for the decommissioning of Fiddlers Ferry providing additional brownfield land for development of houses.	Elected representatives, Residents	A shorter Plan period would reduce the likelihood of Fiddlers Ferry coming forward in the Plan period due to the lengthy decommissioning and remediation periods associated with the site. The owners of the site have indicated that the site would be developed for new employment uses.
A new power plant on the site at Fiddler’s Ferry operating on gas or biomass would have a far smaller footprint than the current power station, leaving a huge Brown Field area for development.	Elected representatives, Residents	Agreed, were a new power plant to come forward at the site in the future, this is likely to have a much smaller footprint than the existing Power Station, potentially freeing up land for power-related and other employment development.
There is a lot of potential for regeneration on the Fiddlers Ferry site once decommissioned.	Elected representatives, Residents	Agreed, the site has the potential to be a major focus for employment and economic activity linking with other initiatives within the area, including the Widnes Waterfront regeneration area in Halton.
Development of Fiddlers Ferry for housing would result in less Green Belt	Elected representatives, Residents	The Council is aware that while Fiddlers Ferry power station is likely to continue operating into the next decade, Government energy policy is

<p>being used.</p>		<p>putting pressure on the cessation of coal power by 2025. The site does represent a major future brownfield redevelopment opportunity. However, the operators of the site have indicated that employment uses will continue on the site once the power station has been decommissioned.</p> <p>Given the operator’s intension to maintain power generation on the site, issues of potential land contamination and the importance of ensuring future development is consistent with Halton’s plans for the wider Widnes Waterfront area, the Council does not consider that residential development would be appropriate on the site.</p>
<p>There is uncertainty regarding the use of Fiddlers Ferry in the Local Plan as there is no firm indication of when it will close and there does not appear to have been a thorough investigation of the ground conditions and viability.</p>	<p>Elected representatives, Residents</p>	<p>The investigation of the ground conditions is not the responsibility of the Council. If the site were to be developed, a condition could be added at the Planning application stage to address any identified contaminated land.</p>
<p>Fiddlers Ferry would be a more appropriate place to develop a new Garden City.</p>	<p>Elected representatives, Residents</p>	<p>The owners of the site have indicated that the site, post Power Station would be developed for new employment uses.</p> <p>Given the operator’s intension to maintain power generation on the site, issues of potential land contamination and the importance of ensuring future development is consistent with Halton’s plans for the wider Widnes Waterfront area, the Council does not consider that residential development would be appropriate on the site.</p>
<p>Pleased that Fiddlers Ferry and its potential for development has been recognised, but this needs to be part of a definite commitment by the Council.</p>	<p>Elected representatives, Residents</p>	<p>As part of the Local Plan process, the Council has been liaising with Agents acting on behalf of the Owners of Fiddlers Ferry, Scottish Southern Energy. The owners have indicated that the site would be developed for new employment uses, once the existing Power Station ceases to operate.</p> <p>The decommissioning and demolition of the existing Power Station will however take a number of years to complete. There is not currently therefore sufficient certainty for the site be included within the Council’s developable employment land supply, but given the scale of the site, this will need to be kept under review. The likelihood of the site coming forward at some</p>

		<p>point in the future does however mean that the Council is confident it will have sufficient employment land to meeting Warrington's needs well beyond the end of the Plan Period and 'safeguarding' of additional land for employment development is not required.</p>
<p>Fiddlers Ferry's future is uncertain, which means its use is difficult to outline in the PDO. One option could be to hold back the building of a large number of houses and only allow them to be built if Fiddlers Ferry or other Brown Field Land were to become available. Effectively this would then become part of the safeguarded requirements.</p>	<p>Elected representatives, Residents</p>	<p>The Council is aware that while Fiddlers Ferry power station is likely to continue operating into the next decade, Government energy policy is putting pressure on the cessation of coal power by 2025. The site may therefore come forward for development and does represent a major future brownfield redevelopment opportunity. However, the owners of the site have indicated that the site would be developed for new employment uses.</p> <p>The decommissioning and demolition of the existing Power Station will however take a number of years to complete. There is not currently therefore sufficient certainty for the site be included within the Council's developable employment land supply, but given the scale of the site, this will need to be kept under review. The likelihood of the site coming forward at some point in the future does however mean that the Council is confident it will have sufficient employment land to meeting Warrington's needs well beyond the end of the Plan Period and 'safeguarding' of additional land for employment development is not required.</p> <p>Given the operator's intension to maintain power generation on the site, issues of potential land contamination and the importance of ensuring future development is consistent with Halton's plans for the wider Widnes Waterfront area, the Council does not consider that residential development would be appropriate on the site.</p>
<p>Development of this area would regenerate Warrington Town centre.</p>	<p>Residents</p>	<p>The owners of the site have indicated that the site would be developed for new employment uses, and as such, would not directly regenerate the Town Centre of Warrington.</p>
<p>SSE is broadly supportive of the Council's recognition that the Power Station remains an operational site and that it may continue to be used for power generation in the future. However,</p>	<p>Other stakeholders</p>	<p>Agreed. It is considered that Policy DEV4-Economic Growth and Development of the Proposed Submission Version Local Plan responds to the representation received from the Owner of the Power Station and is considered to be an appropriate basis for the future development of the site.</p>



<p>consider that the future policy for FFPS should allow for greater flexibility of uses at the site that the existing LPCS Policy PV2.</p>		
<p>Urban capacity could increase if Fiddlers Ferry becomes available.</p>	<p>Elected representatives, Residents</p>	<p>The owners of the site have indicated that the site would be developed for new employment uses, and as such, would not be available for residential development.</p> <p>The decommissioning and demolition of the existing Power Station will however take a number of years to complete. There is not currently therefore sufficient certainty for the site be included within the Council's developable employment land supply, but given the scale of the site, this will need to be kept under review. The likelihood of the site coming forward at some point in the future does however mean that the Council is confident it will have sufficient employment land to meeting Warrington's needs well beyond the end of the Plan Period and 'safeguarding' of additional land for employment development is not required.</p>
<p>Support for excluding Fiddlers Ferry from the development trajectory - redevelopment of the site is likely to be complex due to decommissioning and remediation processes, and therefore the site can't be depended up on to meet the Council's housing requirement. Although a brownfield site, it is in an isolated location and lacks access to services.</p>	<p>Developers/agents</p>	<p>Given the operator's intension to maintain power generation on the site, issues of potential land contamination and the importance of ensuring future development is consistent with Halton's plans for the wider Widnes Waterfront area, the Council does not consider that residential development would be appropriate on the site.</p>
<p>The Government's approach to coal fired power stations means that the Fiddlers Ferry site should be considered 'available' as a starting point and the PDO can be reviewed in due course should this not be the case.</p>	<p>Residents</p>	<p>The Council is aware that while Fiddlers Ferry power station is likely to continue operating into the next decade, Government energy policy is putting pressure on cessation of coal power by 2025. The site may therefore come forward for development and does represent a major future brownfield redevelopment opportunity. However, the owners of the site have indicated that the site would be developed for new employment uses.</p> <p>The decommissioning and demolition of the</p>

		<p>existing Power Station will however take a number of years to complete. There is not currently therefore sufficient certainty for the site be included within the Council’s developable employment land supply, but given the scale of the site, this will need to be kept under review. The likelihood of the site coming forward at some point in the future does however mean that the Council is confident it will have sufficient employment land to meeting Warrington’s needs well beyond the end of the Plan Period and ‘safeguarding’ of additional land for employment development is not required.</p> <p>Given the operator’s intension to maintain power generation on the site, issues of potential land contamination and the importance of ensuring future development is consistent with Halton’s plans for the wider Widnes Waterfront area, the Council does not consider that residential development would be appropriate on the site.</p>
<p>With uncertainty over its closure and deliverability it would be wrong to make allowances for the site as either an allocated employment or allocated housing site in the emerging Plan. The site does not have the locational characteristics or offer the appropriate strategic location required to become a strategic employment site. It is not well related to the strategic highway network.</p>	<p>Developers/agents</p>	<p>The site is currently an operational employment site and the owners of the site have indicated that the site would be developed for new employment uses, once the power station ceases to operate.</p> <p>The future development of the site (to include any highway related issues) is set out in Policy DEV4-Economic Growth and Development of the Proposed Submission Version Local Plan.</p>
<p>With regards to the possibility of the Fiddlers Ferry site potentially coming forward for redevelopment, Highways England would welcome the opportunity to comment upon proposals as evidence is prepared and plans progress.</p>	<p>Other stakeholders</p>	<p>Comment noted and the Council will continue to work with Highways England.</p>

## Theme 12: Safeguarded Land

No of responses Part 1	36
No of responses Part 2	257
<b>Total</b>	<b>293</b>

### Overview

A much higher number of developers, landowners and agents provided a response than residents and community groups. This may be because safeguarding is a relatively technical concept. The more detailed responses from the local community were provided by Borough Councillors, Parish Councillors and Parish Councils.

### Key Issues

Respondents generally commented on either the methodology the Council used for calculating the amount of land to be safeguarded or the location of the land proposed for safeguarding.

Of the submissions from developers, landowners and agents, they were generally supportive of the need to safeguard land, with the majority submitting detailed objections in relation to the amount proposed to be safeguarded and its location.

Responses from the community objected to the scale of safeguarded land as well as its location.

### Conclusion

Having reviewed the representations to the PDO, carried out a review of potential need for homes and employment land beyond the plan period, and considered potential land supply beyond the plan period, the Council has concluded that there is no need for any safeguarding of land to meet future development needs. The Council is confident that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period.

The rate of increase in households decreases significantly over the last 10 year period of the Plan and is likely to fall further in the period beyond the Plan. In providing a positive plan for growth, the Council considers that by the end of the Plan period, house price affordability will no longer be a significant issue in Warrington and therefore any uplift beyond the household projections will be minimal. Given the rate of job growth is also forecast to decrease over time, the Council considers that in providing for the needs of household growth there will be sufficient new homes to provide a balance with future jobs growth.

The Local Plan is already providing for an additional 2 years of land in applying a 10% flexibility factor in its land requirement calculation. The proposed Garden Suburb allocation in the draft Local Plan will provide for around 2,300 homes beyond the Plan period. The Council considers there will also be significant remaining capacity within the existing urban area as demonstrated through its masterplanning work.

Uncertainties around the timescales for decommissioning and the requirements for extensive site remediation mean that Fiddlers Ferry has not been included in the Plan's identified employment land supply at this stage. It will however contribute to meeting Warrington's longer term employment needs meaning that it is not necessary to consider safeguarding additional land for employment beyond the Plan period

A summary of all issues under this theme and the Council's response to them are set out below in Table 12.

Table 12: Safeguarded Land - Issues and Responses

Issue	Respondent Type	Council Response
The future development rates are based on those used within the Plan period, which are flawed and too high.	Elected representatives	The Council accepts that it is not appropriate to simply project forward development need calculations beyond the Plan Period. The Council has subsequently reviewed its evidence relating to the need for homes and employment land beyond the Plan Period, as well as its assumptions on likely future land supply. From this evidence, the Council has concluded there is no need to identify safeguarded land for future development.
Guarantees are needed to ensure that brownfield land is developed prior to safeguarded land.	Elected representatives	The Local Plan's spatial strategy is based around prioritisation of development within the existing urban area. The decision not to safeguard land will ensure that prioritisation can continue to be given to brownfield land within and beyond the Plan Period.
Object to the land east of the A50 being safeguarded, given likelihood of other available land and with the A50 itself a viable Green Belt boundary.	Elected representatives	The Council is no longer proposing to safeguard land to the east of the A50. The Council considers that land to the west of the A50 within the proposed Garden Suburb will provide a supply of homes beyond the end of the Plan period. The A50 is therefore the main Green Belt boundary in this location, with the exception of a parcel of land at the junction of the M6/M56 which has been allocated for employment development.
The safeguarded period should be 20 years, providing for a further full Plan period.	Developers/agents	The Council is confident that considering development needs over an additional 10 years to the 20 year Plan period will enable the permanence of Green Belt boundaries in the long Term in accordance with the requirements of the NPPF.
Objection to discount of safeguarding requirement by the flexibility factor used in the calculation of land to be allocated in the Plan period.	Developers/agents	The flexibility factor provides additional land over and above that required to meet development needs during the Plan Period. It is therefore entirely appropriate that this should be taken into account when considering whether safeguarded land is required.
The assumption of available	Developers/agents	The Council accepts that the rate of

<p>brownfield capacity is too high given brownfield land will be used up in the Plan period.</p>		<p>brownfield development is unlikely to be sustained. However, there is considerable uncertainty as technological and development advances may result in significant brownfield potential which is not currently anticipated. The Council considers it has made a proportionate and realistic assessment of potential brownfield capacity beyond the plan period. This assessment will be kept under review and will inform future reviews of the Local Plan.</p>
<p>The density and net developable area assumptions used in calculating the safeguarded land requirement are too optimistic.</p>	<p>Developers/agents</p>	<p>The Council is no longer proposing to safeguard land.</p>
<p>A broader distribution of safeguarded land is required.</p>	<p>Developers/agents</p>	<p>The Council is no longer proposing to safeguard land.</p>
<p>Some sites proposed to be safeguarded can be brought forward for development straight away. These sites should be allocated.</p>	<p>Developers/agents</p>	<p>The Council is no longer proposing to safeguard land.</p>
<p>Triggers should be included within the Plan to identify when safeguarded land can be released.</p>	<p>Developers/agents</p>	<p>The Council is no longer proposing to safeguard land. The Council will keep development needs and land supply under review and this will inform future reviews of the Local Plan.</p>

### Theme 13: Vision and Objectives

No of responses Part 1	37
No of responses Part 2	1229
<b>Total</b>	<b>1266</b>

#### Overview

The Council received a large response to the vision and objectives of the Plan from all types of respondents.

#### Key Issues

The overwhelming majority of responses from residents, community groups and Parish Councils expressed objection to the Plan having a vision that would promote Warrington's transformation from a New Town to a 'New City'. Similarly, there was significant objection to the scale of the Plan's development aspirations and the consequential need to release Green Belt land. A large number of respondents expressed concern that there was a lack of public involvement in defining the vision and objectives, particularly relating to the scale of development being proposed.

Whilst support was expressed for number of the objectives relating to the town centre, infrastructure, character and environmental protection, a number of respondents considered these aspects should be strengthened and that the scale of development proposed in the first objective was contradictory with the other objectives.

A large number of respondents considered that greater priority should be given to addressing existing problems of congestion and focusing on regenerating the inner area of Warrington before consideration is given to Green Belt release.

Conversely, the majority of developers supported the Plan's vision and development aspirations. Those promoting land in the outlying settlements considered that greater priority should be given to their development potential.

#### Conclusions

The PDO was not proposing that Warrington formally changes its status from a town to a city. It was used as a concept to help explain how the Council was seeking to promote and sustainably manage Warrington's future growth. The draft Local Plan reflects the Council's growth aspirations, as set out in the Warrington Means Business Regeneration Framework, but specific references to Warrington New City have been removed from the Plan.

The PDO consultation was undertaken at a relatively early stage of the Plan making process. This has enabled extensive community engagement on the vision and objectives of the Plan. The Council has taken into account all representations made to the PDO and the earlier Scope and Contents consultation in defining the vision and objectives of the Proposed Submission Version Local Plan.

It is important the Local Plan is consistent with the growth aspirations of the Council if Warrington is to ensure that future growth is sustainable and to ensure the Council is able to plan for the required supporting infrastructure. Following the PDO consultation the Council has undertaken a comprehensive review of its development needs evidence to ensure that the level of growth proposed in the Local Plan is aspirational but also realistic.

Having reviewed Warrington’s future development needs, sought to maximise the potential of the existing urban area and established that neighbouring boroughs are not able to accommodate any of Warrington’s housing growth, the Council still considers that it is not possible to meet Warrington’s future development needs without Green Belt release. It should be noted that St Helens are making a contribution to meeting Warrington’s employment land needs through the proposed western extension of the existing Omega development

The Council also considers that the level of need, combined with the Plan’s spatial strategy provide the exceptional circumstances necessary to justify Green Belt release. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 13.

Table 13: Vision and Objectives – Issues and Responses

Issue	Respondent Type	Council Response
Objection to aspiration of Warrington becoming a City.	Elected representatives, residents	The PDO was not proposing that Warrington formally changes its status from a town to a city. It was used as a concept to help explain how the Council was seeking to promote and sustainably manage Warrington’s future growth.  The draft Local Plan reflects the Council’s growth aspirations, as set out in the Warrington Means Business Regeneration Framework, but specific references to Warrington New City have been removed from the Plan.
The Local Plan should be based on meeting identified development needs and not aspirational needs.	Elected representatives, residents	It is important the Local Plan is consistent with the growth aspirations of the Council if Warrington is to ensure that future growth is sustainable and to ensure the Council is able to plan for the required supporting infrastructure.  Following the PDO consultation the Council has undertaken a comprehensive review of its development needs evidence to ensure that the level of growth proposed in the Local Plan is aspirational but also realistic.
Lack of community involvement in defining vision and objectives.	Elected representatives, residents	The PDO consultation was undertaken at a relatively early stage of the Plan making process. This has enabled extensive community engagement on the vision and objectives of the Plan. The Council has taken into account all

		representations made to the PDO and the earlier Scope and Contents consultation in defining the vision and objectives of the Proposed Submission Version Local Plan.
Support for scale of Plan's development ambitions.	Developers/agents.	Support noted.
Objection to principle of Green Belt release and to including an objective which specifically looks to release Green Belt land.	Elected representatives, residents	<p>Having reviewed Warrington's future development needs, sought to maximise the potential of the existing urban area and established that neighbouring boroughs are not able to accommodate any of Warrington's housing growth, the Council still considers that it is not possible to meet Warrington's future development needs without Green Belt release.</p> <p>The Council also considers that the level of need, combined with the Plan's spatial strategy provide the exceptional circumstances necessary to justify Green Belt release. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.</p> <p>The Council accepts that Objective W2 should not be to release Green Belt. The Objective has therefore been revised to confirm its function is to ensure the permanence of the revised Green Belt boundaries over the long term.</p>
Objectives are contradictory with scale of development proposed threatening infrastructure, environmental and character objectives.	Elected representatives, residents	In assessing the spatial options for the Local Plan and in assessing individual allocation sites, the Council has considered performance against all of the Plan Objectives, informed by a wide range of technical evidence base. Whilst there will be impacts associated with Warrington's future growth, the Council is confident the Local Plan provides the basis to ensure these impacts can be appropriately mitigated.
Objectives are poorly defined, not measurable and not achievable.	Elected representatives, residents	The objectives have been refined to ensure they are clearly defined. The draft Local Plan contains a monitoring



		framework to measure the performance of the Plan and a review mechanism to enable the Council to address any issues that arise in the future.
Support for regeneration of Town Centre and inner Warrington.	Residents, elected representatives, developers/agents, other stakeholders	Support noted.
Need to consider sub-regional infrastructure context and relationship with adjoining boroughs	Other stakeholders, elected representatives	The Council has carried out extensive engagement with neighbouring authorities, the LEP, Highways England, and infrastructure providers in ensuring Warrington's Local Plan takes into account relevant sub-regional issues. The Council has also engaged in the preparation of the Transport for the North Strategic Transport Plan.
Greater weight should be given to Warrington's environment, its countryside and the character of its places and settlements.	Residents, elected representatives	The Council considers the assessment process and the draft Local Plan itself give significant weight to Warrington's environment, countryside and character.
Insufficient consideration is given to problems faced by existing communities, including those of deprived inner areas and congestion across the town.	Residents, elected representatives	A key priority for the Local Plan is the regeneration of Inner Warrington and supporting existing communities in these areas. The Plan will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.  More detailed guidance for the regeneration of Inner Warrington will be provided through the emerging Central Area masterplan.
No reference to Warrington's historic environment in any of the objectives.	Residents, elected representatives, other stakeholders	Objective W5 has been amended to make specific reference to the historic environment.
The vision and objectives do not give any consideration to future technological changes	Residents	The Council has taken into account potential technological advancements in its assumptions around future development needs and land requirements. The Local Plan will be subject to ongoing review to ensure that it can appropriately respond to new and emerging technologies.
The vision and objectives should focus on Warrington becoming less car dominated	Residents	Reducing car reliance has informed the spatial strategy and objectives of the Plan. It is also a key objective of the emerging Local Transport Plan which has been prepared at the same time as the

		draft Local Plan.
Greater consideration should be given to the development potential of the outlying settlements.	Developers/agents	The Council considers the Proposed Submission Version Local Plan's spatial strategy provides the appropriate balance between meeting the needs of the outlying settlements and ensuring their character and environmental assets are preserved and enhanced. The implications of higher levels of development in the settlements has been assessed as part of the Local Plan / SA/SEA process.
Objectives should ensure that infrastructure is in place ahead of development	Residents, elected representatives, other stakeholders	The requirement for the delivery of infrastructure to support growth is established in the vision of the plan and Objective W1. The more detailed planning and allocation policies provide criteria to ensure that infrastructure is appropriately phased to support new development and to ensure that undue pressure is not placed on existing infrastructure.
Vision does not provide Warrington with a specific identify and objectives will result in Warrington becoming a commuter town for Liverpool and Manchester	Residents, elected representatives	An underlying principle of the Local Plan is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in Warrington.
Greater prioritisation should be given to brownfield development	Residents, elected representatives	A key priority for the Local Plan is the regeneration of inner Warrington and maximising the potential of brownfield sites. The Plan will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.  The Council has carried out a detailed assessment of brownfield capacity through its SHLAA and masterplanning work.
Reference to city is misleading if Warrington is not seeking formal city status.	Residents, elected representatives	The PDO was not proposing that Warrington formally changes its status from a town to a city. It was used as a concept to help explain how the Council was seeking to promote and sustainably manage Warrington's future growth.  The draft Local Plan reflects the Council's growth aspirations, as set out in the Warrington Means Business

		Regeneration Framework, but specific references to Warrington New City have been removed from the Plan.
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## Theme 14: Green Belt Assessment

No of responses Part 1	19
No of responses Part 2	352
<b>Total</b>	<b>371</b>

### Overview

Issues regarding the Green Belt Assessment were raised by a number of residents, agents, statutory consultees, Parish Council's and a neighbouring authority. Responses were predominantly from residents with only a few coming from Parish Council's, agents, statutory consultees, stakeholders and a neighbouring authority. Responses were overwhelming made at the second stage of the regulation 18 consultation.

### Key Issues

Responses generally commented on the appropriateness of using a subjective methodology for assessing the contribution that sites/areas make to the Green Belt and the use of consultants who undertake work for private developers as well. There were, also numerous comments made about the outcome of the assessment of various parcels and specific sites from residents, statutory consultees and agents. Primarily these were focused on parcels and sites around the proposed south east and south west extensions and the settlements of Lymm and Culcheth.

In addition, there were objections from residents that the Green Belt assessment did not take into account other factors such as landscape character, ecology and the agricultural value of land. Lastly, there a number of comments from both agents/landowners and residents in respect of the ARUP Green Belt Assessment – Addendum (June 2017) following the Regulation 18 Scoping Consultation.

The responses from residents generally outlined concerns about the appropriateness of the use of the chosen consultants (ARUP) who undertook the Green Belt Assessment and the application of the methodology for assessing the parcels and specific sites. The assessment is not considered to be an independent assessment of the Green Belt as there are perceived conflicts of interest as the consultants are widely known to be consultants to the building industry. In addition, responses from residents generally outlined concerns about the subjective nature of the assessment process and that the methodology was not being applied consistently between the original Green Belt Assessment (Oct 2106) and the additional Green Belt Assessment of Call for Sites Responses and SHLAA Green Belt Sites (Jun, 2017).

The responses in respect of individual parcels in the Green Belt Assessment (Oct, 2016) and the subsequent Green Belt Addendum Report (Jun, 2017) following the Regulation 18 Consultation, were both in support of the assessment and objecting to the outcome of the assessment for a variety of reasons. In respect of the Addendum Report the key issue was in respect of HS2 and whether or not this should have been taken into account in the assessment process. Views were mixed on this matter.

## **Conclusion**

The consultants who undertook the GB Assessment were appointed through a competitive a procurement process carried out by the Council. There is no conflict of interest involved in Arup undertaking the work. Arup do not hold a future building interest over any land in Warrington.

The General Area Assessment is not intended to be a mathematical addition of the contribution of every parcel or site within that General Area. The General Areas were assessed first. The whole of the Garden City Suburb has not been divided into parcels/sites therefore it is not correct to say it comprises 32 parcels of land. An exercise to divide the whole of the Garden City Suburb into parcels/site is still required to be undertaken.

The 2016 Green Belt Assessment and 2017 Green Belt Site Assessments provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible. The team undertaking the assessments was fully briefed and provided with a guidance note which included set terminology and a qualitative scale relating to how the criteria should be applied in order to ensure the correct understanding and consistent application of the criteria. The Arup assessment did not recommend sites or areas to be released, this process was undertaken by WBC.

Whilst, there were concerns expressed about the assessment of a number of parcels and sites these were often balanced by support for the ARUP Assessment. The Council are satisfied that the assessments were carried out in a consistent and fair manner and that the results are robust.

The Green Belt Assessment was just one assessment and was not intended to be a comprehensive assessment of all of the issues. Other issues, such as landscape character, ecology and agricultural land value were taken into account through other assessments such as the specific site assessments and the SA/SEA and HRA Assessments.

A summary of all issues under this theme and the Council's response to them are set out below in Table 13.

**Table 14: Green Belt Assessment – Issues and Responses**

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
Objection to the use of GB land around Weaste Lane as this land provides a 'strong' contribution.	Resident	Comments noted.
Parcel GA9 - Objection to the reclassification of GB at Thelwall Heyes.	Resident	The parcel at Thelwall Heyes was assessed as making a moderate contribution to the Green Belt, this was predominantly due to their role in preventing further ribbon development. The site at Thelwall Heyes was assessed as making a

		weak contribution as part of the site assessments. However, this site is completely different to the parcel therefore this was not a reclassification. It was assessed in accordance with the methodology.
Parcel LY22 – Support for ARUP assessment of parcel as making a “Strong” contribution to the purposes of the GB. Objection to Agent representations (Berry’s) to change ARUP assessment.	Residents	Comments noted.
The methodology used for assessment of Green Belt as weak, moderate or strong is a subjective scoring system and is not an official government policy.	Residents, Neighbouring Councils	<p>The 2016 Green Belt Assessment and 2017 Green Belt Site Assessments provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The method is based on a review of national policy, guidance and good practice. The inclusion of a very detailed methodology to assess purposes 1-5 was provided to minimise subjectivity, ensure transparency, and ensure the most consistent application of the methodology as feasibly possible.</p> <p>The Arup assessment did not recommend sites or areas to be released, this process was undertaken by WBC.</p> <p>Issues such as landscape character, agricultural value, recreation, wildlife, air quality and flood management are not relevant in Green Belt Assessments. These issues are separate planning considerations. In particular, the PAS guidance recognises that landscape should not be a consideration when assessing the contribution of Green Belt to the fulfilling of purposes.</p>
The GB Assessment does not consider landscape character, agricultural value, recreation, impact on wildlife, air quality and flood management.	Residents	
The general areas as recorded in the ARUP report appear arbitrary and are defined by nothing other than physical lines of separation. They are not supported by a landscape character assessment and are distorted further by a series of random mergers.	Residents	
The assessment methodology is very subjective and either ignored or undervalues paragraphs 79 to 92 of the NPPF. The methodology is biased to targeting South Warrington as making a “Weak” contribution to the purposes of the GB.	Residents	

Assessment not comprehensive and limits ability to make comparisons.	Other stakeholders	Paragraph 77 of the 2016 Green Belt Assessment Report states that durable features were used in the first instance to define parcel boundaries drawn from the settlement to the nearest durable feature. Mill Lane, Bellhouse Lane and Runcorn Road are the nearest durable features and were therefore used. Purpose 1 specifically relates to large built up areas, therefore it is important that this was defined. Purpose 1 relating to sprawl has been defined as applying to the 'large built up area' of Warrington only. As a result of another representation both WR65 and R18/125 have been reassessed to take into account the proposed Western Link Road [see Arup note issued on 13/11/18]. Moore is a washed over village in the Green Belt and therefore it does not count as a settlement or a town for any of the purposes. In relation to purpose 4, the approach is clearly explained and justified in the method at paragraphs 110-130 of the Green Belt Assessment report (2016). The Conservation Areas in neighbouring authorities have been considered and include Widnes and Runcorn.
Parcel WR65 - should have been dealt with as 2 separate parcels as it is divided by a watercourse.	Other stakeholders	
There is no assessment for the Green Belt area proposed to be released through the Waterfront proposal.	Other stakeholders	
The Assessment only considers the development of sites contributing to outward sprawl from Warrington and is inconsistent in places with some assessments discussing the strengths of boundaries that do not form an existing Green Belt edge [ie. GA14 (Moderate) and R18/125-SWUE (Weak)].	Other stakeholders	
The assessment of the 'remaining gap' between Warrington and Halton disregards the presence of existing built development (i.e. Moore Village), and the effects on the remaining 'perceived gap' on the ground.	Neighbouring Councils	
Further information is needed on the significance of Warrington Town centre and Lymm Conservation Area on the Green Belt and why other historic assets in Warrington and neighbouring authorities are not considered.	Other stakeholders	
Parcel LY21 – Objection to the amendment of parcel from “Strong” (ARUP GB Assessment,	Residents	The Addendum Report (2017) at page 12 clearly explains why LY21 has been amended. It is not the case that 'facts have changed since

Oct 2016) to “Moderate” (WBC GB Assessment Addendum Report, Jun 2017 – Page 13).		October 2016', it is that the original assessment had a typing error and incorrectly referred to non-protected woodlands when in fact the woodlands are TPO woodlands. It also referred to active farms in error.
Parcel LY21 – Objection to the amendment of parcel from “Strong” to “Moderate”. The way the parcel boundary is drawn skews the way in which the methodology has been applied when assessing the parcel (ie. Including Lymm High School within LY21 increases the % of built form).	Residents	In addition, the parcel has not been drawn in order to skew the outcome, the parcel was drawn in accordance with the boundary definition methodology.
Parcel LY21 - Support for amendment to Parcel LY21 (Strong to Moderate) in GBA Addendum (Jun 2017). However, considered that should be amended further to "Weak".	Developers/agents	Support noted. The site has been assessed in accordance with the methodology, which does not support a classification of “Weak”.
Disagree with ASA (Jul 2017) for Parcel R18/111. It is not consistent with area or parcel assessment (LY21).	Developers/agents	Site R18/111 is very different from Parcel LY21 and has therefore been assessed differently. Site R18/111 does not include any built form (unlike LY21). Site R18/111 also has less durable boundaries compared to parcel LY21, for example LY21 includes the TPO woodland boundary to the north whilst R18/111 follows tree and field boundaries.
Site Ref: R18/111 – Support for the assessment of site as making a “Strong” contribution to the purposes of the Green Belt.	Residents	Comments noted.
General support of GB Assessment from Lymm residents.	Residents	Comments noted.
Disagree with GB Assessment (2016) that land north of Knutsford Rd (identified as safeguarded land	Developers/agents	Assumed this relates to sites: R18/112, 1623, 1624, 1625, 1626, 1627. These sites have been assessed in accordance with the methodology.



<p>adjoining the proposed SEUE) makes a “Strong” contribution to the Green Belt in this location.</p>		
<p>Agree with the findings in the GB Assessment (2016) and additional site assessments carried out in 2017 that the Green Belt parcels making up the Garden City Suburb make a “weak” contribution to the purposes of the Green Belt, resulting in an overall “moderate” contribution.</p>	<p>Developers/agents</p>	<p>Comments noted.</p>
<p>Parcels LY21, LY22, LY25, LY26 and LY27 – Support for the assessment of these parcels.</p>	<p>Residents</p>	<p>Comments noted.</p>
<p>GB Assessment (2016) - Describing Green Belt land as low value ignores the contribution of agricultural land. The impact on farming should take priority.</p>	<p>Other stakeholders</p>	<p>There is nothing in the Green Belt Assessment that describes agricultural land as being 'spare' or of low value. The definition of built form considers that land use for agricultural purposes is an acceptable use in the Green Belt.</p>
<p>Conflicting comments of the appropriateness of the GB Assessment (2016) considering the implications of the proposed HS2 route and the justification for treating the HS2 route as a readily recognisable physical feature in appraising the contribution made.</p>	<p>Residents, developers/agents</p>	<p>The Warrington Local Plan Review is intended to meet Warrington’s housing and employment needs from now until 2037. With HS2 Phase 2b intended to be operational in 2033, it is therefore considered appropriate to use the safeguarded HS2 route as a boundary. As the 2017 Addendum report states, at the time of writing the 2016 Green Belt Assessment the HS2 route had not been formally safeguarded by the Department for Transport. In November 2016 the preferred HS2 Phase 2b route was safeguarded meaning it is protected from conflicting development. It is therefore regarded as appropriate to consider it as a boundary since no development is allowed to conflict with it.</p>

<p>Parcel WR65 and Site Ref: R18/125 - Parcel WR65 is divided by a watercourse; it should have been dealt with as 2 separate parcels.</p> <p>There are fundamental inconsistencies between the Green Belt Assessment undertaken by Arup (October 2016) and Warrington Borough Council's Additional Sites Assessment (July 2017). The Council's downgrading of purpose 1 (sprawl) from '<i>moderate</i>' to '<i>weak</i>' and purpose 4 (setting of historic towns) from '<i>moderate</i>' to '<i>no contribution</i>' is entirely unjustified.</p> <p>In relation of Purpose 4, the Council's assessment of site R18/125 fails to acknowledge the existence of Walton Village Conservation Area. This is completely unjustified, particularly as site R18/125 includes land to the immediate west of the conservation area. This omission fundamentally undermines the validity of the assessment.</p>	<p>Elected representatives</p>	<p>Both the GB Assessment (2016) and the Site Assessments (2017) were undertaken by Arup. It is accepted that there is a slight inconsistency in the assessment of purpose 1 between WR65 and R18/125 however both were assessed as moderate contribution overall.</p> <p>The Green Belt Assessment (Oct 2016) and the Additional Sites Assessment (July 2017) are assessing different parcels of land, which contain different features and hence can result in different results.</p> <p>The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied.</p> <p>Paragraph 77 of the Green Belt Assessment (2016) states that durable features were used in the first instance to define parcel boundaries drawn from the settlement to the nearest durable feature. Mill Lane, Bellhouse Lane and Runcorn Road are the nearest durable features and were therefore used. Purpose 1 relating to sprawl has been defined as applying to the 'large built up area' of Warrington only.</p> <p>As a result of another representation both WR65 and R18/125 have been reassessed to take into account the proposed Western Link Road [see Arup note issued on 13/11/18].</p> <p>Moore is a washed over village in the Green Belt and therefore it does not count as a settlement or</p>
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		<p>a town for any of the purposes. In relation to purpose 4, the approach is clearly explained and justified in the method at paragraphs 110-130 of the Green Belt Assessment (2016). The Conservation Areas in neighbouring authorities have been considered and include Widnes and Runcorn. In terms of Walton Village Conservation Area this has not been included in the assessment of Purpose 4 and the justification for the approach to purpose 4.</p>
<p>Site Ref 3362: - The site is a small part of the wider Parcel GA13 and does not itself make a meaningful contribution to the purposes of the Green Belt.</p>	<p>Developers/agents</p>	<p>The assessment of General Areas enabled a wider assessment encompassing the whole of the Warrington Green Belt. GA13 has been assessed in accordance with the methodology. Following on from this, smaller parcels were defined. The General Areas and parcels do not relate to ownership boundaries or promoted site boundaries. The site in question (3362 &amp; R18/P2/117) has been assessed as part of the site assessments. It is assessed as making a strong contribution.</p>
<p>Objection to GB methodology in that it does not consider the special character and setting of Grappenhall village. Conclusions on durability of Bridgewater canal as a barrier are nonsensical.</p>	<p>Residents</p>	<p>The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. The boundary definition approach is based on national policy, guidance and good practice. In terms of Grappenhall Village CA this has not been included in the assessment of Purpose 4 and the justification for the approach to purpose 4 is set out at paragraphs 110-130 of the 2016 Green Belt Assessment.</p>
<p>Parcel WR6 - Disagree with assessment of Parcel</p>	<p>Developers/agents</p>	<p>Parcel WR6 has been assessed in accordance with the methodology.</p>

<p>WR6. Site Refs: R18/046 and R18/140 are only a small proportion of Parcel WR6, are PDL and hence only make “Weak” contribution to the Green Belt.</p>		<p>Sites R18/046 and R18/140 have also been assessed in accordance with the methodology. R18/046 is assessed as making a weak contribution to the Green Belt predominantly due to it being enclosed by existing development in the Green Belt. Site R18/140 is assessed as making a moderate contribution to the Green Belt predominantly due to its non-durable northern and eastern boundaries. Parcel WR6 is assessed as making a moderate contribution to the Green Belt predominantly due to its non-durable eastern boundary and the existing encroachment within the parcel.</p>
<p>Conflict of interest in engaging ARUP to undertake Greenbelt Assessment, as it is widely known that they are consultants to the building industry. Therefore, the assessment is not an independent assessment of the Green Belt.</p>	<p>Residents</p>	<p>The original 2016 Green Belt commission was awarded to Arup following a procurement process carried out by WBC. There was no conflict of interest involved in Arup undertaking the work. Arup do not hold a future building interest over any land in Warrington. Any future commissions, which Arup may get involved in would be subject to a consideration of any conflict of interest.</p>
<p>Parcel GA5 - There are several areas of green space that do not appear to have been classified as such when considering the Green Belt (areas such as Westy Point, Latchford Trail and Westy Wood are not marked on Maps GA1 or GA2).</p>	<p>Resident</p>	<p>These areas have not been assessed because they do not fall within the Green Belt.</p>
<p>Site Ref: R18/P2/117 - The site is a small part of the wider General Area Parcel (GA13) and does not itself make a meaningful contribution to the purposes of the Green Belt.</p>	<p>Developers/agents</p>	<p>The assessment of General Areas enabled a wider assessment encompassing the whole of the Warrington Green Belt. General Area 13 has been assessed in accordance with the methodology. Following on from this, smaller parcels were defined. The General Areas and parcels do not relate to</p>

		ownership boundaries or promoted site boundaries. The site in question has been assessed as part of the Site Assessments (2017). It is assessed as making a strong contribution.
Parcel LY8 - Disagree with assessment. Parcel should be concluded as "moderate".	Developers/agents	Parcel LY8 and site R18/082 have been properly assessed as strong. The Inspector's comments are 20 years old and it is likely that the factors relevant to the Green Belt Assessment such as boundaries, openness, views, built form and vegetation will have changed during this time. The Inspector's comments were made in a different context and most likely according to a different methodology. The assessment of the parcels cannot be based on comments made 20 years ago. Site visits were undertaken for all parcels as part of the assessment.
Parcel W17 - Disagree with assessment. Site Ref: R18/P2/144 is only a small proportion of Parcel W17; is self-contained and when assessed in isolation only makes a Weak contribution to the Green Belt.	Developers/agents	The assessment of General Areas enabled a wider assessment encompassing the whole of the Warrington Green Belt. Following on from this, smaller parcels were defined. The General Areas and parcels do not relate to ownership boundaries or promoted site boundaries. The site was assessed in July 2017. It was split into a north and south site. R18/001(north) was assessed as moderate, whilst R18/001(south) was assessed as strong). We do not agree with the Green Belt assessment set out in the representation. This is not in accordance with our methodology.
Parcels LY25, GA6 and GA8 – The approach to scoring is inconsistent. The wording in the analysis does not reflect the score given.	Developers/agents	The Green Belt Assessment (2016) and Green Belt Site Assessments (2017) provide an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology which has been consistently applied. GA6 and GA8 have both been correctly assessed in accordance with the

		methodology. The assessment of purpose 2 clearly states that they form a 'largely essential gap' which in accordance with the methodology represents a moderate contribution. Parcel LY25 has been correctly assessed in accordance with the methodology and the surrounding sites have been consistently assessed.
Site Ref: R18/036 – Disagree with assessment. The site should be scored as making a “Weak” contribution.	Developers/agents	The site has been assessed in accordance with the methodology. Only existing boundaries are assessed as part of the methodology, proposed new boundaries are not considered.
Parcel WR65 – Disagree with assessment. The parcel should be re-assessed “Weak” taking account of the Western Link proposals.	Developers/agents	Parcel WR65 is slightly different to the proposed site. The site has been assessed as R18/125. The proposed Western Link Road was not used as a boundary at the time of the assessment as it was not a confirmed road scheme. As the scheme is now an official Council scheme, the boundary has been used and the parcel and the site assessments have been revised. The overall assessment remains unchanged and is still moderate. Disagree with their assessment. R18/125 has been assessed in accordance with the method. Due to the size of the site it would not be assessed as weak regardless of where the future development is proposed on the site.
The methodology assesses small individual parcels to identify those of least value ignoring strategic issues such as need to reduce urban sprawl; does not address the purposes of the green belt in terms of assisting with urban regeneration; assumes that if a parcel of land is separate from built up areas then it has lesser role to prevent	Elected representatives	The Green Belt Assessment (2016) provides an assessment of both larger 'General Areas' and smaller parcels in order to cover the entire extent of the Green Belt. Urban sprawl is covered by purpose 1 and has not been ignored by the assessment. Purpose 5 relates to assisting in urban regeneration and the methodology clearly explains why the defined approach to assessing purpose 5 has been taken (see para 132-136 of the 2016 Green Belt Assessment). In

<p>sprawl; does not explain why it assumes merging of Burtonwood to Warrington to be acceptable; and it relies on flawed concept of openness in terms of the absence of built development, a topography which supports long line views and low levels of substantial vegetation.</p>		<p>relation to 'neighbouring towns' for the assessment of Purpose 2, para 96-102 of the Green Belt Assessment explains how these have been defined. Burtonwood has not been defined as a 'neighbouring town'. This does not mean that the merging of Burtonwood and Warrington is deemed to be acceptable. As with the rest of the methodology, the concept of openness is based on a review of national policy, guidance and good practice. A similar approach was applied in the Cheshire East Green Belt Assessment and was accepted by the Inspector.</p>
<p>Site Ref: R18/081 – Disagree with assessment. Should be scored as making a “Moderate” contribution not “Strong”.</p>	<p>Developers/agents</p>	<p>The site has been assessed in accordance with the methodology. Professional judgement has been applied to evaluate the overall contribution. The site has been assessed as making a strong contribution due to the non-durable boundaries to the west and south.</p>
<p>Site Ref: R18/088 - Disagree with assessment and question why the site has been split into two parcels.</p>	<p>Developers/agents</p>	<p>This is a site submitted as part of the <i>Call for Sites</i> and therefore the boundaries have been drawn by the site submitter and not Arup or WBC. If the site is deemed to be one site which is split by a road, it has been assessed as a single site.</p>
<p>Site Ref: R18/P2/015 – New site that has not been assessed. Should be assessed as making “Weak” contribution.</p>	<p>Developers/agents</p>	<p>The site has been assessed in accordance with the methodology. Professional judgement has been applied to evaluate the overall contribution and the site has been assessed as making a moderate contribution due to the durable boundaries to the north, east and south.</p>
<p>Site Ref: R18/P2/017 (1866) – Disagree with assessment. Should be scored as making a “Moderate” contribution not “Strong”.</p>	<p>Developers/agents</p>	<p>The site has been assessed in accordance with the methodology. Professional judgement has been applied to evaluate the overall contribution and the site has been assessed as making a strong contribution due to the strong degree of openness and the non-</p>

		<p>durable boundaries with both the countryside and the settlement.</p>
<p>Parcel LY23 – Since ARUP GB Assessment was undertaken Planning Permission has been granted at Lymm Rugby Club for housing, which impacts on parcel at Crouchley Lane. This should be re-assessed as “<i>Weak</i>”.</p>	<p>Developers/agents</p>	<p>At the time of the GB Assessment (2016) the planning permission (2016/28521) had not been determined. Nevertheless, the development is confined to a small area of the site that is PDL. Therefore, it is considered that it does not alter the assessment.</p>
<p>Site Ref: R18/P2/124 (R18/138) - Disagree with assessment. Should be scored as making a “<i>Moderate</i>” contribution not “<i>Strong</i>”.</p>	<p>Developers/agents</p>	<p>The site has been assessed in accordance with the methodology. Professional judgement has been applied to evaluate the overall contribution and the site has been assessed as making a strong contribution due to are non-durable boundaries between the site and the settlement which mean that the site has a strong role in preventing encroachment into the Green Belt. In addition, the site makes a strong contribution to checking the unrestricted sprawl of Warrington and from preventing towns from merging.</p>
<p>Parcel CH9 – Support for assessment of parcel as “<i>Weak</i>”.</p>	<p>Developers/agents</p>	<p>The Warrington Local Plan Review is intended to meet Warrington’s housing and employment needs from now until 2037. With HS2 Phase 2b intended to be operational in 2033, it is therefore considered appropriate to use the safeguarded HS2 route as a boundary. As the Addendum Report (2017) states, at the time of writing the 2016 Green Belt Assessment the HS2 route had not been formally safeguarded by the Department for Transport. In November 2016 the preferred HS2 Phase 2b route was safeguarded meaning it is protected from conflicting development. It would therefore be illogical not to consider it as a boundary since no development is allowed to conflict with it.</p>
<p>Parcel CH9 – Disagree with the revised assessment. Should be scored as making a “<i>Strong</i>” contribution.</p>	<p>Elected representatives</p>	



<p>Site R18/P2/126 (Previous R18/002) - Support the assessment as “Weak”.</p>	<p>Developers/agents</p>	<p>Comments noted.</p>
<p>Object to assessment of Garden Suburb - The General Area Assessment clearly shows that the Garden Suburb has been assessed as weak. Having cross referenced this with every single parcel of land assessed by Arup, there are significant mathematical discrepancies. In total the Garden City Suburb comprises 32 parcels of land. Of these, 12 are assessed as weak, 13 are assessed as medium and 7 are assessed as strong. Furthermore, the 12 parcels of weak land are a tiny acreage in comparison to the rest.</p>	<p>Resident</p>	<p>The General Assessment is carried out at a strategic level and is a separate process to that for the consideration of individual development parcels and sites.</p> <p>The Council has considered the impact of the loss of Green Belt at both a strategic and local level in its spatial options assessment process. This is provided as evidence base to the Proposed Submission Draft Local Plan.</p>
<p>GA10 – Disagree with the assessment. Sites classified as offering a “Weak” contribution to greenbelt seem to suffer in the process as a result of having natural boundaries rather than being directly next to the urban area. From para. 87 “If a durable boundary between the parcel and built up area exists, conclude parcel makes a weaker contribution to checking unrestricted sprawl”. In the case of GA 10 (which will contain most of development) it is penalised under Purpose 1 because of its western boundary being Lumb Brook and the Dingle valley and woods. This boundary adds value</p>	<p>Resident</p>	<p>The Green Belt Assessment (2016) clearly set out a methodology which is based on national policy, guidance and good practice. General Area 8 has been assessed in accordance with the methodology.</p>

to the Green Belt.		
The Viking settlements of Thelwall and Lymm were not considered to be historic settlements in the assessment.	Residents	The Green Belt Assessment methodology is based on a review of national policy, guidance and good practice and uses the five Green Belt purposes set out in national policy (the NPPF) as the basis for the criteria for the assessment. In relation to purpose 4, Lymm is considered to be a historic town for the purposes of the assessment and the reasoning and justification for this is clearly explained in the methodology.
SE Warrington - The information in the Village Design Statement for Grappenhall & Thelwall (2003) has relevant points relating to the value of the GB which should be considered.	Residents	The Green Belt Assessment (2016) clearly set out a methodology which is based on national policy, guidance and good practice and is fully explained in detail. We do not agree that landscape.
Parcel W18 - The results of the assessment of this parcel do not reflect the characteristics of Site Ref: R18/P2/128, which is a much smaller parcel of land. Should be assessed as "Weak".	Developers/agents	The Green Belt Assessment (Oct 2016) and the Additional Sites Assessment (July 2017) are assessing different parcels of land, which contain different features and hence can result in different results.  The General Areas and parcels do not relate to ownership boundaries or promoted site boundaries. The site in question (3362 & R18/P2/128) has been assessed as part of the site assessments.
GA8 - Disagree with assessment. It should be scored as making a "Moderate/Weak" contribution to the five Green Belt purposes.	Developers/agents	General Area 8 has been assessed in accordance with the methodology. Moderate-weak is not considered to be assessment category.
Site Ref: R18/065 - Disagree with assessment. Should be scored as making a "Weak" contribution not "Moderate".	Developers/agents	Land at Crouchley Lane – The parcel assessment is a larger area of land. Do not propose reassessment of the parcel due to the planning permission. Do not agree with the agent's assessment which states that the tree belt to

		the south and west limits the degree of openness. This is not how openness is assessed according to the methodology. Do not agree that the site has durable boundaries. The ARUP assessment has concluded that the boundaries with the countryside are partially durable, and the southern boundary (field boundaries) is not durable. The agent's assessment of purpose 4 is not in accordance with the ARUP methodology and represents a site specific heritage type assessment.
Site Ref: R18/011 – Agree with assessment. Should be scored as making a “Weak” contribution.	Developers/agents	Comments noted.
Site Ref: R18/068 - Disagree with assessment. Should be scored as making a “Weak” contribution not “Strong”.	Developers/agents	Land at Longbutt Lane - The parcel is slightly larger than the site but broadly similar. The site was assessed as making a strong contribution. The agent's assessment does not follow the methodology. Reference is made to rounding off which is not relevant to purpose 3. Disagree that the parcel has a limited/weak degree of openness, the site is completely open with no built form and long line views. The ARUP assessment methodology has been consistently applied.
Site Ref: R18/059 - Disagree with assessment. Should be scored as making a “Weak” contribution not “Moderate”.	Developers/agents	The site has been correctly assessed as moderate. The WBC Site Assessment Proforma (south) has a typing error in the Site Comments Section - it says weak when it should be moderate - the GB assessment is correct.
Site Ref: R18/014 - Disagree with assessment. Should be scored as making a “Weak” contribution not “Moderate”.	Developers/agents	The site has been assessed in accordance with the methodology. Disagree with the agent's assessment of the site. The site does not make 'no contribution' to purpose 3 as their assessment suggests as the site has no built form and some less durable boundaries.

<p>Site Ref: R18/053 (R18/P2/146A) - Disagree with GB Assessment (Additional Site, Jul 2017). Should be scored as making a "Weak" contribution not "Moderate". Site is 50% PDL. The west of the site is covered in buildings and an existing house.</p>	<p>Developers/agents</p>	<p>The site has been assessed in accordance with the methodology. The buildings on site represent a former agricultural use and are therefore considered appropriate in the Green Belt. As such the buildings do not count as built form as part of the assessment. The site also has a non-durable northern boundary and as such it has been assessed as making a strong overall contribution.</p>
<p>Support the Council's assessment of Site Ref: R18/076 as "Strong".</p>	<p>Resident</p>	<p>Comments noted.</p>
<p>Green Belt Assessment (2016) - it is impossible to cross reference the site references to the plan. It is therefore very difficult/impossible to comment on the written classification (weak/moderate/strong) for individual sites.</p>	<p>Resident</p>	<p>The Green Belt parcel and site references are shown on the accompanying detailed plans to enable cross referencing across the documents. The chloropleth map does not show the reference numbers due to its scale. .</p>
<p>Site Ref: R18/082 - Disagree with the "Strong" rating for the farmland north of Rushgreen Road closest to Lymm village centre. This sizeable field provides views northwards and its retention is critical for established Green Belt purposes and to the preservation of the character of Lymm.</p>		<p>Comments noted. The site has been assessed in accordance with the methodology.</p>
<p>WBC has previously insisted GB was high quality so gypsy &amp; travellers could not occupy but its strength is now being re-categorised.</p>	<p>Residents</p>	<p>The Green Belt Assessment (2016) is a separate exercise to assessing specific planning applications, were other material considerations are balanced with the Green Belt designation.</p>
<p>The ARUP report does not assess the Green Belt appropriately for the south of Warrington and undervalues the area.</p>	<p>Resident</p>	<p>The Green Belt Assessment (2016) and the Green Belt Site Assessment (2017) provide an objective independent assessment of how the Green Belt contributes</p>

<p>This should be re-assessed.</p>		<p>to the five purposes based on a defined methodology which has been consistently applied. The parcels and sites in the south of Warrington have been consistently and objectively assessed as per the rest of the Warrington Green Belt.</p>
<p>Parcels LY15 and LY20 - Disagree with assessment. Should be scored as making a "Moderate/Strong" contribution not "Weak". Using ARUP assessment method they are considered as separate parcels but this is perverse. Spud Wood is a nature reserve! Splitting it from LY21 is not justified as in reality on the ground they form part of the same parcel of land with no obvious border between them.</p>	<p>Resident</p>	<p>The parcels have been drawn in accordance with the boundary definition methodology and have been assessed in accordance with the assessment methodology.</p>
<p>Parcels GB2 and GB3 - In the ARUP GB Assessment GB2 and GB3 are the wrong way round. Over half of the area covered by GB2 has planning consent for display gardens which are open to the public which has not been considered. GB3 has planning consent for a Bird of Prey Centre (which is now a golf course), for a children's play area and for an outside cafe seating area. ARUP's assessment has failed to consider these developments which cover most of the area beyond the garden centre lake. GB3 cannot therefore make a "Strong" Contribution to the 5 purposes of including land in the</p>	<p>Developers/agents</p>	<p>Parcel GB2 - At the time of the GB Assessment (2016) the planning permission (2016/29468) had not been implemented. Nevertheless, the development is confined to a small area of the site that is PDL. Therefore, it is considered that it does not alter the assessment. However, the GB Assessment has been updated to include a reference about the permission.</p> <p>Parcel GB3 - It is acknowledged that the assessment should have taken into account the existing uses on site (although, some of these uses have been constructed since the assessment was done). Taking into account the level of built form the assessment changes to weak overall. The GB Assessment will be updated to reflect this.</p>

Green Belt.		
Site Ref: R18/115 - Disagree with assessment. Should be scored as making a "Weak" contribution not "Moderate".	Resident	The site has been assessed in accordance with the methodology.
Parcel GA10 and Site Ref: R18/106 - Disagree with assessment. Should be scored as making a "Strong" contribution not "Moderate".	Residents	The site has been assessed in accordance with the methodology. Professional judgement has been applied to evaluate the overall contribution as the site makes a strong contribution to safeguarding from encroachment. However, overall the site is assessed as making a moderate contribution due to the strength of its eastern and northern boundaries which could contain development.

## Theme 15: Exceptional Circumstances for Green Belt Release

No of responses Part 1	6
No of responses Part 2	370
<b>Total</b>	<b>376</b>

### **Overview**

The Council received a large response to the issue of whether exceptional circumstances can be demonstrated to justify the release of Green Belt. The majority of the respondents were from residents, Borough Councillors, Parish Councillors and Parish Councils, although a number of developers also responded.

### **Key Issues**

The overwhelming response was that the Council had not demonstrated exceptional circumstances for Green Belt Release and that the Council had not exhausted all other options for meeting development needs. Many stressed that the Council had not given proper consideration to the potential of brownfield land or increased densities in the urban area.

A large number of responses considered that the Council had not taken into account the environmental, character, recreational or agricultural benefits of Green Belt.

Conversely, the developers who responded did consider that the Council had demonstrated exceptional circumstances.

### **Conclusion**

The Council is able to fully evidence and justify the exceptional circumstances required for Green Belt release, in accordance with the NPPF.

In accordance with paragraph 137 of the NPPF the Council has examined fully all other reasonable options for meeting Warrington's identified need for development before concluding that exceptional circumstances exist to justify Green Belt release.

The Local Plan will ensure that as much use as possible is made of suitable brownfield sites and underutilised land. The masterplanning work that Warrington & Co are leading on will unlock significant additional urban capacity over and above that identified in the Council's Brownfield Register and Strategic Housing Land Availability Assessment (SHLAA).

The Council recognises that some of these opportunities will fall outside of the Plan period. Together with the future availability of Fiddlers Ferry Power station and other potential sites within the wider existing urban area, this negates the requirement to take any additional land out of the Green Belt as Safeguarded Land.

Following the PDO consultation the Council has reviewed its density assumptions for the town centre and inner Warrington and is reviewing its residential parking standards, recognising the potential for high density development in these locations. The Council is proposing minimum density requirements for the town centre, together with minimum density requirements for all site allocations to minimise the amount of Green Belt release required.

The Council has reconfirmed that no neighbouring authorities are able to meet any of Warrington's housing needs. St Helens are making a contribution to meeting Warrington's employment land

needs through the proposed western extension of the existing Omega development. This is demonstrated in the Council’s Statement of Common Ground. It is also apparent that all of Warrington’s neighbouring authorities are having to release Green Belt themselves to meet their own development needs.

The starting point for Warrington’s exceptional circumstances is the requirement to ensure that sufficient land is provided to meet the Council’s development needs and economic aspirations.

The exceptional circumstances are further justified through the spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.

This will ensure that the release of Green Belt land will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole.

Exceptional circumstances can also be demonstrated for each area of Green Belt release:

- The Garden Suburb will ensure that a major proportion of Warrington’s need for housing and employment land can be met sustainably through comprehensive planning and infrastructure delivery. The scale of the Garden Suburb will also provide capacity for growth well beyond the Plan period, ensuring the permanence of the revised Green Belt boundaries.
- The South West Extension will provide a new sustainable community supported by local infrastructure and services and will be facilitated by the Western Link.
- The exceptional circumstances for the removal of Port Warrington from the Green Belt relate to the specific demand for Port facilities servicing the Manchester Ship Canal, the location of the existing Port and the potential to connect the Ship Canal to the strategic road and rail network.
- The exceptional circumstances for the removal of the Waterfront Business Hub from the Green Belt relate to the overall need for employment land, the opportunity to provide complementary employment space for Port related development and the proximity of the site to the town centre and Bank Quay station.
- Green Belt release in the outlying Settlements will increase housing choice and support the vitality and viability of local services.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 15.

Table 15: Exceptional Circumstances for Green Belt Release– Issues and Responses

Issue	Respondent Type	Council Response
The Council has not demonstrated that exceptional circumstances exist to justify the release of Green Belt land in accordance with the NPPF.	Residents, elected representatives	The starting point for Warrington’s exceptional circumstances is the requirement to ensure that sufficient land is provided to meet the Council’s development needs and economic aspirations.  The exceptional circumstances are further justified through the



		<p>spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.</p> <p>This will ensure that the release of Green Belt land will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole.</p> <p>Exceptional circumstances can also be demonstrated for each area of Green Belt release.</p>
<p>Meeting Warrington’s need for development does not in itself demonstrate exceptional circumstances in accordance with the NPPF.</p>	<p>Residents, elected representatives</p>	<p>The starting point for Warrington’s exceptional circumstances is the requirement to ensure that sufficient land is provided to meet the Council’s development needs and economic aspirations.</p> <p>The exceptional circumstances are further justified through the spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.</p> <p>This will ensure that the release of Green Belt land will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole.</p>

		<p>Exceptional circumstances can also be demonstrated for each area of Green Belt release.</p>
<p>The Council's desire to become a City is not considered to be 'exceptional circumstances'.</p>	<p>Residents, elected representatives</p>	<p>The PDO was not proposing that Warrington formally changes its status from a town to a city. It was used as a concept to help explain how the Council was seeking to promote and sustainably manage Warrington's future growth.</p> <p>The starting point for Warrington's exceptional circumstances is the requirement to ensure that sufficient land is provided to meet the Council's development needs and economic aspirations.</p> <p>The exceptional circumstances are further justified through the spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.</p> <p>This will ensure that the release of Green Belt land will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole.</p> <p>Exceptional circumstances can also be demonstrated for each area of Green Belt release.</p>
<p>The level of development need has been overestimated meaning there is no need for the scale of Green Belt Release being proposed.</p>	<p>Residents, elected representatives</p>	<p>The Council has updated its evidence base relating to housing, employment and retail needs to ensure the Plan is based on up to date evidence,</p>

		<p>meets the requirements of the new National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) and addresses widespread public concern that the Council was using economic forecasting data that pre-dated the EU Referendum.</p>
<p>All other alternative options have not been thoroughly exhausted before concluding that Green Belt land is required for development, as required by the NPPF / A61 of Housing White Paper. There is significant brownfield capacity in the town centre, Fiddlers Ferry power station and the hospital site.</p>	<p>Residents, elected representatives</p>	<p>In accordance with paragraph 137 of the NPPF the Council has examined fully all other reasonable options for meeting Warrington’s identified need for development before concluding that exceptional circumstances exist to justify Green Belt release.</p> <p>The Local Plan will ensure that as much use as possible is made of suitable brownfield sites and underutilised land. The masterplanning work that Warrington &amp; Co are leading on will unlock significant additional urban capacity over and above that identified in the Council’s Brownfield Register and SHLAA.</p> <p>The Council recognises that some of these opportunities will fall outside of the Plan period. Together with the future availability of Fiddlers Ferry and other potential sites within the wider existing urban area, this negates the requirement to take any additional land out of the Green Belt as Safeguarded Land.</p> <p>Following the PDO consultation the Council has reviewed its density assumptions for the town centre and inner Warrington and is reviewing its residential parking standards, recognising the potential for high density development in these locations. The Council is</p>

		<p>proposing minimum density requirements for the town centre, together with minimum density requirements for all site allocations to minimise the amount of Green Belt release required.</p> <p>The Council has reconfirmed that no neighbouring authorities are able to meet any of Warrington’s housing needs. St Helens are making a contribution to meeting Warrington’s employment land needs through the proposed western extension of the existing Omega development. This is demonstrated in the Council’s Statement of Common Ground. It is also apparent that all of Warrington’s neighbouring authorities are having to release Green Belt themselves to meet their own development needs.</p>
<p>Exceptional circumstances have not been demonstrated as to why Green belt release is required in the South West Extension, the Garden Suburb, the south in general or for individual sites in the settlements.</p>		<p>Exceptional circumstances can be demonstrated for each area of Green Belt release:</p> <p>The Garden Suburb will ensure that a major proportion of Warrington’s need for housing and employment land can be met sustainably through comprehensive planning and infrastructure delivery. The scale of the Garden Suburb will also provide capacity for growth well beyond the Plan period, ensuring the permanence of the revised Green Belt boundaries.</p> <p>The South West Extension will provide a new sustainable community supported by local infrastructure and services and will be facilitated by the Western Link.</p> <p>The exceptional circumstances for the removal of Port</p>

		<p>Warrington from the Green Belt relate to the specific demand for Port facilities servicing the Manchester Ship Canal, the location of the existing Port and the potential to connect the Ship Canal to the strategic road and rail network.</p> <p>The exceptional circumstances for the removal of the Waterfront Business Hub from the Green Belt relate to the overall need for employment land, the opportunity to provide complementary employment space for Port related development and the proximity of the site to the town centre and Bank Quay station.</p> <p>Green Belt release in the outlying Settlements will increase housing choice and support the vitality and viability of local services.</p>
<p>Little consideration has been given to landscape character, the loss of countryside, ancient woodland, the rural character of villages, recreational value or the heritage value of the Green Belt in the judgement of releasing land for the 'exceptional circumstances'</p>	<p>Residents, elected representatives</p>	<p>The assessment of Green Belt relates to the 5 purposes of Green Belt as set out in the NPPF.</p> <p>The Council has considered the environmental, heritage, character and recreational impacts of meeting development needs, and of specific spatial options and potential site allocations, in its options and site assessment work.</p>
<p>To justify releasing Green Belt land in the PDO the council has placed an over-reliance on the October 2016 Arup report on the Green Belt. The report should be set aside and an accurate assessment be made of the Green Belt issues before moving to the next stage of the local plan.</p>	<p>Residents, elected representatives</p>	<p>The Council considers that the Green Belt assessment is robust and provides an appropriate evidence base for the preparation of the Local Plan.</p>

<p>The PDO plans to "safeguard" land for the future, if development cannot be planned for the foreseeable future then the need to declassify green belt cannot be regarded as "exceptional circumstances".</p>	<p>Residents, elected representatives</p>	<p>The Council has reviewed its evidence relating to the need for homes and employment land beyond the Plan Period, as well as its assumptions on likely future land supply. From this evidence, the Council has concluded there is no need to identify safeguarded land for future development.</p>
<p>Support the acceptance that Green Belt release is required, and welcome the fact that the exceptional circumstances for this are set out in the PDO, including the acknowledgement in that not releasing Green Belt to meet housing needs will have major socio-economic impacts, on infrastructure, local services and the general health and well-being of the population.</p>	<p>Developers/agents</p>	<p>Support Noted.</p>
<p>The land in South Warrington is in productive agricultural use. In the context of Brexit/climate change consideration should be given to not using Green Belt land or a smaller portion of it.</p>	<p>Residents, elected representatives</p>	<p>The assessment of Green Belt relates to the 5 purposes of Green Belt as set out in the NPPF.</p> <p>The Council has considered the effect on the availability of agricultural land in its assessment of the impacts of meeting development needs and in its assessment of specific spatial options and potential site allocations.</p> <p>The Plan will result in the loss of agricultural land, but the vast majority of land in the borough currently in active agricultural use, or with the potential for agricultural use, will be protected.</p>
<p>While, the NPPF does allow for Green Belt boundaries to be altered in exceptional circumstances, the extensive alterations in the Council's preferred option appear to be of a scale far greater than</p>	<p>Residents, elected representatives</p>	<p>In preparing the Local Plan, the Council has undertaken all necessary steps to ensure that the release of Green Belt is minimised.</p> <p>The Council has updated its</p>

<p>envisaged in the guidance.</p>		<p>evidence base relating to housing, employment and retail needs to ensure the Plan is based on up to date evidence, meets the requirements of the new National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).</p> <p>The Council has undertaken an exhaustive exercise of reviewing the capacity of the existing urban area to accommodate additional development, including reviewing all brownfield site and promoting higher development densities. It has also confirmed that no neighbouring authority can assist in meeting Warrington’s housing needs.</p>
<p>To propose significant changes to the boundary some 11 years after the Green Belt was defined seems to be clearly contrary to the guidance in the NPPF and Policy CS5 of the adopted Local Plan Core Strategy.</p>	<p>Residents, elected representatives</p>	<p>The original extent of the Green Belt was confirmed in the Warrington Unitary Development Plan. This was adopted in 2006 and prepared in a fundamentally different planning policy context which pre-dated the NPPF.</p> <p>The Local Plan Core Strategy was adopted following publication of the NPPF in 2014 but the housing target within the Plan was quashed in the High Court in 2015.</p> <p>The Council is therefore preparing the Local Plan to ensure that Warrington’s long term development needs are met. Having established that Exceptional Circumstances exist to release Green Belt, the Plan will ensure that the revised Green Belt boundaries are capable of enduring over the long term, well beyond the end of the Plan period in 2037.</p>





## Theme 16: Spatial Options Process and Outcome

No of responses Part 1	25
No of responses Part 2	631
<b>Total</b>	<b>656</b>

### Overview

The Council received a large response to the Spatial Options process that informed the PDO from all types of respondents.

### Key Issues

Responses from residents, community groups and Parish Councils expressed concern that the process was complex, difficult for the local community to understand and that it was not clear how the Council had objectively assessed one option against another. There were also concerns that the technical evidence base was insufficient to undertake the assessment.

Residents, community groups, Parish Councils and a number of developers did not consider that the Council has assessed all reasonable alternatives and had ruled certain options out too early in the process.

Residents in the south were concerned that the outcome of the process resulted in a disproportionate amount of Green Belt release in the south. Similarly, developers promoting sites outside of the main development areas proposed in the PDO were not satisfied with the outcome of the process. In particular they expressed concern that the Council was overly reliant on two large urban extensions which may not be viable and will not deliver homes early in the Plan period.

### Conclusions

Given the number and nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan

The Council has made a number of changes to the spatial options assessment process in response to representations made to the PDO Consultation:

- the options assessments have been combined into a single table to enable easier comparison between the performance of each option;
- a more concise assessment has been undertaken against each of the Local Plan Objectives themselves, rather than deriving a series of more detailed assessment criteria; and
- a summary of the SA/SEA/HRA conclusions for each option has been included within the options assessment table to more clearly demonstrate how this work has informed the spatial options assessment process.

The Council has now considered additional spatial development options looking at the potential of sites in north Warrington and options with lower levels of development in south Warrington.

The conclusions of the options assessment process still support the allocation of the Garden Suburb and South West urban extension with incremental growth in the outlying settlements. The overall level of Green Belt release is lower than that proposed in the PDO.

The NPPF recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, including significant extensions to existing towns,

provided they are well located and designed, and supported by the necessary infrastructure and facilities. The Council acknowledges that there are longer lead in time associated with urban extensions and the draft Plan therefore proposes a 'stepped housing trajectory' in recognition of this.

A summary of all issues under this theme and the Council's response to them are set out below in Table 16.

Table 16: Spatial Options Process and Outcome –Issues and Responses

Issue	Respondent Type	Council Response
<p>The spatial options process is too complex for residents to understand</p>	<p>Residents, elected representatives</p>	<p>The PDO consultation document was prepared as an explanatory document rather than a formal Plan to help the public understand the Local Plan process. The Council also prepared a You Tube video and held a number of public events where Planners were able to explain technical planning issues to the public.</p> <p>Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan</p> <p>The Council has a made a number of changes to the spatial options assessment process in response to representations made to the PDO Consultation:</p> <ul style="list-style-type: none"> <li>- the options assessments have been combined into a single table to enable easier comparison between the performance of each option;</li> <li>- a more concise assessment has been undertaken against each of the Local Plan Objectives themselves, rather than deriving a series of more detailed assessment criteria; and</li> <li>- a summary of the SA/SEA/HRA conclusions for each option has been included within the options assessment table to more clearly demonstrate how this work has informed the spatial options assessment process.</li> </ul>
<p>Process based on developer</p>	<p>Residents, elected</p>	<p>The Council is required to undertake the</p>

<p>'call for sites' submissions but without sufficient input from public. Public consultation only being undertaken once preferred development option has been selected.</p>	<p>representatives</p>	<p>'call of sites' exercise to demonstrate that development options are capable of being delivered.</p> <p>The Council issued the 'call of sites' at the same time as it carried out its initial Regulation 18 consultation on the scope and content of the Local Plan.</p> <p>The Council undertook the PDO consultation as a second stage of R18 consultation to ensure the public had a genuine say on options for the Plan before the draft Local Plan was prepared in detail.</p>
<p>Insufficient technical evidence relating to environmental impacts, heritage impact, agricultural land quality, flooding, infrastructure capacity, deliverability and transport modelling.</p>	<p>Residents, elected representatives, developers/agents, other stakeholders</p>	<p>The Council used a proportionate technical evidence base to support the options assessment process.</p> <p>The evidence base has been updated, expanded and refined to support the preparation of the draft Local Plan, taking into account the response to the PDO consultation. This includes outputs from the Council's Multi-modal Transport Model and more up to date information about the capacity of existing infrastructure across the borough.</p> <p>The Council has also worked closely with developers promoting sites in the proposed development allocations requesting additional technical studies to address impacts and identify the basis for any appropriate mitigation. Developers have also fed into the Local Plan Viability Assessment.</p>
<p>Imbalance of Green Belt release between south and north of the borough. Much greater proportion of Green Belt release is to the south. North provides better balance to existing and planned job opportunities and connection to M62.</p>	<p>Residents, elected representatives, developers/agents</p>	<p>The Council considered additional spatial development options looking at the potential of sites in north Warrington and options with lower levels of development in south Warrington.</p> <p>Options which included sites in the north did not perform as well due to concerns around the fragmented nature of available sites, which may make infrastructure delivery more difficult, the significant impact on the character of Winwick, transport issues in respect of</p>

		<p>Junction 9 of the M62/A49 and potential noise and air quality impacts from the motorway. Given the location and fragmented nature of the sites in the north, there is less scope to mitigate these impacts without a significant reduction in development capacity.</p>
<p>Assessment process not objective. Unclear how one objective performed against another and why some were discounted. Inconsistent application of New City objective and concern that preferred option was pre-determined.</p>	<p>Residents, elected representatives, developers/agents</p>	<p>Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan.</p> <p>The Council has assessed the option of a lower level of growth and considered additional spatial development options looking at the potential of sites in north Warrington and options with lower levels of development in south Warrington.</p> <p>The Council has a made a number of changes to the spatial options assessment process in response to representations made to the PDO Consultation:</p> <ul style="list-style-type: none"> <li>- the options assessments have been combined into a single table to enable easier comparison between the performance of each option;</li> <li>- a more concise assessment has been undertaken against each of the Local Plan Objectives themselves, rather than deriving a series of more detailed assessment criteria; and</li> <li>- a summary of the SA/SEA/HRA conclusions for each option has been included within the options assessment table to more clearly demonstrate how this work has informed the spatial options assessment process.</li> </ul>
<p>Insufficient consideration given to brownfield development and increasing development densities in the urban area.</p>	<p>Residents, elected representatives</p>	<p>The Council has updated its urban capacity assessment and increased its density assumptions for town centre and inner Warrington sites. A new density band up to 275 dwelling per hectare has been used for town centre sites. This reflects recent planning permissions in</p>

		<p>the town centre for higher density development and the Council's commitment to optimise the use of previously developed land.</p> <p>This work also acknowledges that certain brownfield sites may not come forward in the Plan period but that they still demonstrate that Warrington will still have significant brownfield capacity over the longer term</p>
<p>Insufficient weight given to impact on character, environment, green spaces and infrastructure and constraints of Ship Canal / Mersey in south Warrington.</p>	<p>Residents, elected representatives</p>	<p>Greater consideration has been given to impacts of development, taking into account responses to PDO consultation, prior to confirmation of sites to be allocated in draft Local Plan.</p> <p>The Council therefore considers that the assessment process and the draft Local Plan itself give significant weight to Warrington's environment, countryside and character.</p>
<p>Insufficient consideration given to emerging plans in neighbouring boroughs and other stakeholder plans at a sub-regional level e.g. Environment Agency, Mersey Forest etc</p>	<p>Residents, elected representatives, other stakeholders</p>	<p>The Council held a series of meetings with neighbouring authorities, statutory consultees and infrastructure providers in preparing the PDO and has continued these discussions in preparing the draft Local Plan. This is evidenced in the draft Statement of Common Ground and the Duty to Cooperate statement.</p>
<p>Consideration of impact on Grappenhall and Appleton not consistent with approach to Lymm and Culcheth and Winwick where options considered as unreasonable given impact on character.</p>	<p>Residents, elected representatives</p>	<p>The Council has undertaken a revised Options Assessment and SA/SEA to consider the implications of a greater proportion of development being located to the outlying settlements. It has also given greater consideration to sites to the north which had previously been discounted as an unreasonable development option.</p>
<p>Information in settlement profiles relating to infrastructure is inaccurate.</p>	<p>Residents, elected representatives</p>	<p>The Council prepared the settlement profiles in consultation with the relevant service and infrastructure providers. The Council continues to keep this information up to date as evidenced in the Council's Infrastructure Delivery Plan.</p>
<p>Level of development proposed for settlements is too great for infrastructure and will change their character.</p>	<p>Residents, elected representatives</p>	<p>The Council has consulted relevant service providers to ensure that the existing infrastructure can accommodate the 'incremental' level of growth. The Council considers the scale of</p>

		development proposed relative the size of the settlements means the impact on character under this scenario is not detrimental.
Use of CIL means that development can contribute to infrastructure without being located in that specific area.	Elected representatives, developers/agents	The Council does not currently have CIL, although it may introduce CIL during the Plan period. The Council contends development should be closely related to both local and strategic infrastructure provision to ensure its long term sustainability.
Large amount of development in two main urban extensions, reliant on major infrastructure represents a significant risk and delivery of development will be delayed.	Developers/agents	<p>The Council has undertaken additional work on assessing infrastructure needs, viability and deliverability, taking into account the responses to the PDO consultation.</p> <p>The NPPF at para 72 recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, including significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.</p> <p>The Council acknowledges that there are longer lead in time associated with urban extensions and the draft Plan therefore proposes a ‘stepped housing trajectory’ in recognition of this.</p> <p>Government’s planning guidance recognises that such an approach is appropriate where strategic sites such as those being proposed by the Council will have a phased delivery or are likely to be delivered later in the plan period (PPG Housing and Economic Land Availability Assessment para 34).</p>
Assumptions around build rates and lead in times for urban extensions are too optimistic	Developers/agents	The Council has updated its assumptions on build rates and lead in times, taking into account the responses to the PDO consultation.
The merits of a dispersed development option have been underestimated, with less impact on green belt, infrastructure and character.	Residents, elected representatives, developers/agents	The Council contends that its assessment of the dispersed development options did identify a number of benefits but when considered against other options it was not considered to provide the most sustainable development option for

		Warrington's future growth. The Council has re-assessed the options of more dispersed development options in preparing the draft Local Plan.
Greater development should be provided within the outlying settlements. Benefits to New City concept have been underestimated and sites can come forward quicker than major urban extensions.	Developers/agents	<p>The Council contends that its assessment of additional growth in the settlements did identify a number of benefits but when considered against other options it was not considered to provide the most sustainable development option for Warrington's future growth.</p> <p>The Council has re-assessed the option of a greater proportion of development being located in the settlements. Following this assessment the Council still considers that a greater amount of development in the settlements would result in greater character impacts and provide a weaker contribution to supporting the growth of the main urban area.</p>
Sites to the east, west and north of Warrington should be included within the spatial strategy.	Developers/agents	The Council accepts that sites to the north were ruled out too early in the process and these have now been given greater consideration in the assessment process. The Council considers that it has given detailed consideration of the potential of sites to the west of the borough. Sites to the east have been considered but a major urban extension in this location is considered unreasonable due to environmental impacts.
The 10% limit on growth in settlements under the 'incremental growth' scenario is arbitrary. The actual level of development should be based on a detailed understand of infrastructure capacity and the characteristics of individual sites.	Developers/agents	<p>The Council used the 10% figure to assist in defining development scenarios.</p> <p>The final allocation of sites in the outlying settlements has been based on detailed sites assessment and infrastructure capacity and not strictly limited to 10%.</p>
Not all reasonable alternatives have been considered. Sites to the north and major expansion of settlements should not have been ruled out as unreasonable. Other options include greater development at transport nodes.	Residents, elected representatives, developers/agents	<p>The Council accepts that sites to the north are a reasonable option and should not have been judged unreasonable. As such these have now been included in the further assessment exercise.</p> <p>The Council has also considered major</p>

		<p>settlements extensions as part of the options assessment process, up to around 1,400 new homes.</p> <p>The Council contends that a significantly larger extension to be accommodated in the outlying settlements is an unreasonable option given the Plan's objectives of regenerating the inner area of Warrington and the environmental, sustainability and character implications.</p> <p>The Council is confident that it has explored all other reasonable alternatives.</p>
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**Theme 17: Main Area Profiles (1) & Settlement Profiles (2)**

No of responses Regulation 18 (Part 1)	<b>N/A</b>
No of responses Regulation 18 (Part 2)	<b>(1) 249</b> <b>(2) 39</b>
Total	<b>288</b>

**Overview**

A number of respondents, including Parish Councils and Councillors, Ward Councillors, Residents, Stakeholders and Statutory Consultees raised issues in relation to the details within the Main Area and Settlement profiles.

It should be noted that comments in relation to the Options assessment have been captured and a response provided in Spatial Options theme earlier in this report.

**Key Issues**

In terms of key issues, respondents highlighted a variety of concerns including: how development is significantly biased towards the south, how there is little justification of why these main areas were chosen for development and how there is detail lacking in the profiles such as the influence of development on the historic environment, influence on transport infrastructure, lack of information on the development potential of brownfield sites within the profiles, how each settlement should be analysed on an individual basis with regards to growth and potential capacity, and not given an arbitrary 10% growth figure, the need for the Local Plan to understand the unique characteristics of the area to promote positive development within them, and the need for more affordable housing .

**Conclusion**

Having considered and taken into account all the representations received, the Council is satisfied that the Main Area and Settlement profiles are an appropriate evidence base to inform and underpin the Proposed Submission Version Local Plan.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 17.

Table 17: Main Area Profiles & Settlement Profiles – Issues and Responses

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
The Main Area Profiles and Settlement Profiles do not contain any assessment of the historic environment which may limit the development of certain areas.	Other stakeholders	The Main Area Profiles and Settlement Profiles are high level assessments and were produced to provide an understanding of the characteristics of different local areas, including identifying historical assets within the defined areas. They were not intended to be a detailed assessment of the Historic

		<p>Environment.</p> <p>However, in preparing the Submission Version Local Plan, Officers from the Council have worked extensively with Historic England to ensure that the evidence base and the Proposed Submission Version Local Plan Policies are appropriate to protect and enhance the Historic Environment. This has included preparing Heritage Impact Assessments of the proposed Local Plan allocation sites.</p> <p>Based on the extensive liaison with Historic England, it is therefore considered that the Heritage Impact Assessments and Policy DC2 The Historic Environment sets out a clear approach and guidance on how proposed development should safeguard and respond to the historic environment. It also sets out the Council's strategy for securing and conserving the historic environment and the Borough's heritage assets.</p>
There is support for the Main Area Profiles as It will ensure that the distribution of development throughout the Borough is reflective of the current infrastructure capacity to accommodate new development.	Developers/agents	Comments duly noted.
Option 5 does not require GB release. The rejection of this option is not justified.	Residents, elected representatives	<p>The Council contends that its assessment of the dispersed development option (Option 5) did identify a number of benefits but when considered against other options it was not considered to provide the most sustainable development option for Warrington's future growth. It should be noted that this Option would still have resulted in the requirement for Green Belt release.</p> <p>The Council has re-assessed the options of more dispersed development options in preparing the draft Local Plan.</p>
Some of the options have been conveniently dismissed without any real justification.	Residents, elected representatives, developers/agents	Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the Proposed Submission Version Local Plan.

<p>Methodology for identifying main locations is missing the opportunity to support plan led growth in settlements.</p>	<p>Developers/agents</p>	<p>The Council contends that its assessment of additional growth in the settlements did identify a number of benefits but when considered against other options it was not considered to provide the most sustainable development option for Warrington’s future growth.</p> <p>The Council has re-assessed the option of a greater proportion of development being located in the settlements. Following this assessment the Council still considers that a greater amount of development in the settlements would result in greater character impacts and provide a weaker contribution to supporting the growth of the main urban area.</p>
<p>There is no evidence to highlight the importance of providing safe sustainable transport routes to support these communities.</p>		<p>The Main Area Profiles and Settlement Profiles are high level assessments and were produced to provide an understanding of the characteristics of different local areas. They were not intended to be a detailed assessment of the supporting infrastructure.</p> <p>However, post the PDO, various pieces of evidence base work have been undertaken to inform transport policy formulation and this has been reflected in the Proposed Submission Version Local Plan.</p>
<p>It appears that Option 3 was always going to be the preferred option and that all constraints have been minimized. Option 3 was always going to be the one for major development and the reasons for not developing other areas of the town have been exaggerated.</p>	<p>Residents, elected representatives</p>	<p>Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the Proposed Submission Version Local Plan.</p>
<p>The council is pursuing option 2 for 2000 homes in South West Warrington. Options 1 and 2 would be better as there would be less development towards the south west of Warrington. Less green belt land would be affected and a buffer zone between Warrington and Runcorn would be maintained.</p>	<p>Residents, elected representatives</p>	<p>Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the Proposed Submission Version Local Plan.</p> <p>In re-considering the option of the South West Extension, the Council has now taken into account proposals in the emerging Halton Local Plan and the importance of ensuring appropriate separation between Warrington</p>

		and Runcorn.
All the options seem to point to Warrington being a new city which is not desired.	Residents, elected representatives	<p>The PDO was not proposing that Warrington formally changes its status from a town to a city. It was used as a concept to help explain how the Council was seeking to promote and sustainably manage Warrington's future growth.</p> <p>The options are based on an up to date understanding of Warrington's future development needs.</p>
The Options Assessment unfairly targets the south of Warrington for the majority of development, without any real justification or conclusions.	Residents, elected representatives	<p>Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan</p> <p>The Council has now considered additional spatial development options looking at the potential of sites in north Warrington and options with lower levels of development in south Warrington.</p>
There appears to have been minimal assessment on brownfield sites within the main area profiles.	Residents	<p>The Housing Capacity section of the main Area Profiles provides the information on the Urban Capacity for the profile area. Information is provided to show the total number of urban sites and the number of potential homes that could be accommodated in the within the urban area of the profile area.</p> <p>A detailed understanding of brownfield sites and Urban Capacity across the Borough has been fundamental in preparing the Local Plan. Full details of the work the Council has done in assessing urban capacity is set out in the Council's Urban Capacity Statement, published as evidence base in support of the Proposed Submission Version Local Plan.</p>
It is not understood how any of the options were chosen. It seems like a tick box exercise with the preferred option always being the preferred option and the other 'options' created to show that something else was considered.	Residents, elected representatives, developers/agents	<p>Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan.</p> <p>The Council has a made a number of changes to the spatial options assessment process in response to representations made to the PDO</p>

		<p>Consultation:</p> <ul style="list-style-type: none"> <li>- the options assessments have been combined into a single table to enable easier comparison between the performance of each option;</li> <li>- a more concise assessment has been undertaken against each of the Local Plan Objectives themselves, rather than deriving a series of more detailed assessment criteria; and</li> <li>- a summary of the SA/SEA/HRA conclusions for each option has been included within the options assessment table to more clearly demonstrate how this work has informed the spatial options assessment process.</li> </ul>
<p>I don't understand why development option two, a very large garden city was seen as better fulfilling Option 2 within spatial options (see Question 5) rather than development option 4 which splits the growth more evenly around Warrington.</p>	<p>Residents, elected representatives, developers/agents</p>	<p>Option 4 included sites to the West of Warrington that did not perform as well in terms of impact on Green Belt and the ability to deliver supporting infrastructure.</p> <p>Given the number and nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the Proposed Submission Version Local Plan.</p> <p>Through this process the Council has ensured it is clearer in terms of its assessment of the objectives and its conclusions for selecting the spatial strategy for the Proposed Submission Version Local Plan.</p>
<p>The Settlement Profiles are of too narrow a scope. There should be a clear criterion for the delivery of the required supporting infrastructure.</p> <p>You have not adequately spelt out how the infrastructure (roads/schools/medical services) will cope with the resultant increase in the population.</p>	<p>Residents, elected representatives</p>	<p>The Main Area and Settlement Profiles are a high level assessment and were produced to provide an understanding of the characteristics of different local areas, including identifying existing infrastructure capacity/limitations within the defined areas. They were never meant to be a detailed assessment of the required infrastructure.</p> <p>Detailed infrastructure capacity work has been undertaken post the PDO and used as evidence to inform policy formulation of the Proposed Submission Version Local Plan. The Council has also produced a supporting Infrastructure Delivery Plan, setting out what supporting infrastructure will be required for the proposed level of development.</p>
<p>It is unclear how the scenarios tested have been</p>	<p>Developers/agents</p>	<p>The Area Profiles and Options Assessment Technical Note sets out the detailed rationale</p>

<p>derived. The scenarios seem to be derived from the submitted sites rather than an assessment of the housing need that originates in rural areas (Not para 182 NPPF compliant).</p> <p>Only one growth scenario has been assessed (incremental) for Winwick.</p> <p>Each settlement should be considered in a bespoke manner rather than an arbitrary 10% growth across all.</p>		<p>for the scenario testing and this was made available as part of the PDO consultation.</p> <p>The Council’s housing requirement is a ‘Borough wide’ requirement and has not been derived from the number of sites submitted and this ‘Borough wide’ approach is considered to be NPPF compliant.</p> <p>The 10% growth limit in relation to settlement size is to ensure development is being capable of being accommodated without changing the character of the respective settlement, in a sustainable manner to ensure the viability and vitality of the Settlement over the Plan period.</p> <p>Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan. As part of this work the Council has considered additional spatial development options looking at the potential of sites in north Warrington and options with lower levels of development in south Warrington.</p>
<p>Serious concerns about the capacity of the urban area to deliver the identified level of housing development. Additional sites required in outlying settlements.</p>	<p>Developers/agents</p>	<p>A detailed understanding of brownfield sites and Urban Capacity across the Borough has been fundamental in preparing the Local Plan.</p> <p>Full details of the work the Council has done in assessing urban capacity is set out in the Council’s Urban Capacity Statement, published as evidence base in support of the Proposed Submission Version Local Plan.</p>
<p>The Council's assessment of Hollins Green is disagreed with; further site specific material should be submitted when site allocations are identified.</p>	<p>Developers/agents</p>	<p>Comments duly noted.</p> <p>All the potential development sites submitted as part of the call for Sites exercise were assessed through the Council’s detailed Site Selection process, prior to allocation in the Proposed Submission Version Local Plan, with the allocation policy reflecting the conclusions from the site selection process.</p>
<p>Affordable housing needs to be of a higher consideration in the settlement profiles.</p>	<p>Residents</p>	<p>The Main Area Profiles are a high level assessment and were produced to provide an understanding of the characteristics of different local areas, including identifying existing infrastructure capacity/limitations within the defined areas. They were ever</p>

		meant to be a detailed assessment of the required infrastructure.
The Plan (rightly) emphasises the need to retain the character of settlements. Lymm used to be a village; now it's more or less a town, and is teetering on the edge of being just more suburban sprawl.	Residents, elected representatives	Comments duly noted.
Warrington needs to offer leisure opportunities for ALL the Borough's residents as part of the development of areas.	Residents	Comments duly noted. The Proposed Submission Version Local Plan and policies are to be applied across the whole of the Borough.
The Settlement Profiles are considered to represent a robust evidence-based approach to the assessment of options, including reasonable alternatives.	Developers/agents	Comments duly noted.
For the outlying settlements the figures seem excessive. The growth is clearly not organic growth or sustainable within the existing infrastructure. Reassurance is needed so that the number of households is determined by need not development opportunities.	Residents, elected representatives	<p>The evidence collated to support the area profiles and options appraisal work has concluded that 10% growth in the Outlying Settlements is an appropriate level of growth, based on the existing infrastructure provision, with some limited infrastructure enhancements, to allow the sustainable growth of the settlements over the Plan period.</p> <p>The Council received a large number of potential development sites around the outlying Settlements, and each submitted site has been assessed through a robust site selection process, to ensure the most appropriate sites are allocated to meet the 10% growth figures for the outlying Settlements.</p>

## Theme 18: Social Infrastructure/Health

No of responses Part 1	6
No of responses Part 2	960
<b>Total</b>	<b>966</b>

### Overview

There was understandably a significant response on Social Infrastructure/Health, with the majority of responses being from residents.

### Key Issues

Respondents generally commented on how the increase in population (due to the proposed development) would impact upon the existing infrastructure such as health facilities, local centre amenities, schools, emergency services and sports/recreational facilities. Respondents also discussed how the existing services are not providing for the current population and the doubts on how the development would provide for the proposed population on top of this without serious investment.

Key issues highlighted by respondents included: the need to already have infrastructure in place before any proposed development, the need for a proper investigation into the proposed needs of the areas that are to be developed, to understand how further development won't put strain on the health of the existing residents through increased pollution and reduced access to health and social infrastructure, how enough school places will be provided and details on how the infrastructure will be funded.

### Conclusion

The Proposed Submission Version Local Plan seeks to improve social and community infrastructure over the plan period and across the Borough, in both existing areas and in areas which are the focus for new development. Social infrastructure requirements are clearly set out within the policies for the main development areas and development in other parts of the Borough will be assessed in terms of contributions on a site by site basis.

A summary of all issues under this theme and the Council's response to them are set out below in Table 18.

Table 18: Social Infrastructure and Health –Issues and Responses

Issue	Respondent Type	Council Response
Existing social and health infrastructure is already over stretched and in some cases already full.	Residents, elected representatives	An assessment of existing facilities and anticipated future demand over the plan period has been carried out to inform the Local Plan. The Council is committed to ensuring that existing health facilities are improved and that



		new facilities are provided within new developments, particularly those of a larger scale such as the Garden Suburb. This is clearly set out in Policies MD1 Waterfront, MD2 Garden Suburb, MD3 South West Extension and Policy INF4 Community Facilities.
GP surgeries, dentists, elderly homes, specialist health centres, etc. need to be in place before the development of housing.	Residents, elected representatives	<p>The phasing of infrastructure will be a key consideration when working up the detail to bring forward the major development sites. Policy MD2 (Garden Suburb), for instance, has been worded such that specific infrastructure requirements and the delivery of such requirements must be identified as each sub area of the Garden Suburb is masterplanned. In existing settlements and the main urban area, contributions will continue to be sought to ensure that adequate facilities are in place to support new development.</p> <p>The Local Housing Needs Assessment (2019) highlighted a specific need for elderly accommodation to respond to the Borough's aging population. The Local Plan includes a specific requirement for this provision in Policy DEV2 Meeting Warrington's Housing Needs and there is also specific reference in the policies for the main development area sites including Policies MD2 and MD3.</p>
There are a lack of local amenities such as shops, post office, banks, community halls, and library facilities etc. in villages. This would reduce travel across the town.	Residents, elected representatives	The Local Plan seeks to deliver sustainable development, both within the main urban area and in the major new development areas. A key part of the delivery of sustainable development is to ensure access to local amenities and facilities and to reduce the need to travel
Extra police stations, fire services, emergency	Residents	Noted. The Council is working closely with all service providers as

services are needed with the proposed plans.		it prepares its Local Plan.
Increase in population will result in, more traffic and more pollution which will impact health.	Residents	The Council is fully committed to addressing problems with Air Quality through its Air Quality Action Plan and environmental and amenity protection is fully addressed within Policy ENV10.
There is a strain on sports facilities and leisure facilities and more parks are needed for the area, especially with the potential loss of Trans Pennine Trail, Moore Nature Reserve, Sankey Valley Park.	Residents	<p>The provision of additional sports and leisure facilities has been assessed during the preparation of the Proposed Submission Version Local Plan. Areas of improvement have been identified and level of provision associated with the main development areas has also been assessed. In addition, the main development areas have a significant level of open space included in early masterplanning stages, with significant requirements reflected in Policies MD1, MD2 MD3 and MD4. The Council is committed to avoiding the loss of existing designations wherever possible and providing replacement open space where this cannot be avoided. New provision must also be made within new development sites. This is reflected in policies DC3 Green Infrastructure Network, DC4 Natural Environment and DC5 Open Space.</p> <p>The Proposed Submission Version Local Plan does not propose any changes to the TPT.</p>
Huge pressure on schools, shortage of teachers, shortage of places for students, this will impact on education quality.	Residents	Education requirements have been fully assessed in the preparation of the Proposed Submission Version Local Plan. Requirements within the existing urban area and requirements resulting from the major development sites have been assessed and developers will be required to contribute to facilities through S106 agreements.
Would section 106 agreements be used to	Residents	Yes S106 Agreements will continue to be the main source of securing

<p>provide infrastructure improvements?</p>		<p>funding towards infrastructure improvements, until such a time as the Council introduces a Community Infrastructure Levy (CIL).</p>
<p>Improved facilities are only mentioned in the Garden Suburb and South West Extension, what about the area as a whole?</p>	<p>Residents</p>	<p>The Proposed Submission Version Local Plan seeks to improve the provision of social and community infrastructure across the Borough and not just in areas of new development. This is articulated through Policy INF4 and development will be assessed on a site by site basis.</p>

## Theme 19: Warrington’s Hospital

No of responses Part 1	0
No of responses Part 2	113
<b>Total</b>	<b>113</b>

### Overview

There was a good level of response regarding the hospital, with the majority of responses from local residents who were concerned about the capacity of the hospital to meet the needs of existing residents in the Borough. Additional comments were also received from Councillors and stakeholders.

### Key Issues

Respondents generally had concerns about the existing capacity of the hospital and a frequent comment was that strains on services were already evident. A further increase in population was highlighted as a significant worry on the quality of care residents would get if the hospital is already “struggling” and “underperforming”. Comments were also made regarding the inadequacies of the existing hospital site.

The issue was raised regarding the need for healthcare improvements Borough-wide and not just in the proposed large scale developments.

Respondents discussed how the PDO had a lack of clarity regarding the future of the hospital and any future provision, a lack of transparency on how additional services might be delivered and where new members of staff would come from when there is a strain on the NHS already. A lack of consultation with the NHS and hospital was also highlighted.

### Conclusion

Having reviewed all of the responses and had continued dialogue with NHS partners, we understand that the future plans for the hospital are a priority. Unfortunately plans are not progressed enough for us to include specific site allocations in the Proposed Submission Version Local Plan, however, provision has been made to ensure that healthcare throughout the Borough is continually improved and funding will be sought from new development to improve existing facilities and/or create new ones as needed. The issue of the hospital will remain under review and the Local Plan updated when further information is known as to the future of the hospital.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 19.

Table 19: Warrington’s Hospital –Issues and Responses

Issue	Respondent Type	Council Response
The hospital is already over stretched and underperforming, it	Residents	The Council is aware that the existing hospital requires investment and that with growth

cannot cope with extra demand.		projections further investment will be required beyond this. The Council has been working closely with partners internally and with the NHS to identify specific demands and improvements that can be made through investment from new development.
Existing hospital site is too small and confined. New site should be identified in the Local Plan.	Residents, other stakeholders	The Council is aware that the existing hospital site is limited in terms of future expansion. We are aware that alternative sites are being considered by NHS partners but as yet there are no firm plans. This is likely to be identified through a future review of the Local Plan. In the meantime, the draft Local Plan seeks to provide enhanced supporting community facilities and 'hubs' which will provide health services to residents which will reduce reliance on the main hospital for some types of care where this is appropriate.
Lack of consultations with representatives of hospital or the hospital itself.	Residents	Since the PDO consultation the Council has been having regular and detailed dialogue with NHS partners and internal colleagues to discuss the needs of the hospital over the Local Plan period. Whilst a new site has not yet been identified for inclusion in the Local Plan, we are confident that progress is being made.
Has the hospital provision been properly calculated?	Residents	The Council has been working closely with colleagues in the NHS to calculate the likely demand for healthcare generated by the proposed developments in the draft Local Plan. We are confident that future demand has been carefully assessed to be as accurate as possible at this stage.
There are no plans to show how services might be delivered. Where the extra staff might come from and new services and their location.	Residents	The Proposed Submission Version Local Plan provides more details as to the provision of local health care facilities. For example health facilities are proposed in the Garden Suburb and to support the growth of Lymm. The Council is

		working with the NHS to ensure that their future service planning responds to the level of growth proposed in the Local Plan.
The hospital as it stands is in the best location for the majority of Warrington. Its relocation site is unknown.	Residents	Unfortunately the existing building is severely restricted in terms of meeting future needs. Delivery partners in the NHS and the Council are currently assessing either the redevelopment of the hospital on-site or relocation of the hospital to a new site. The issue of the hospital will remain under review and the Local Plan updated when further information is known as to the future of the hospital.
Relocation of the hospital will provide Brownfield land.	Residents	Noted. When and if plans to move the hospital move forward, careful consideration will be required as to the sustainable re-use of the existing hospital site. This will likely be dealt with in a subsequent Local Plan review.
Concerns as to how healthcare improvements and hospital will be funded.	Residents, elected representatives	Noted. We are in dialogue with delivery partners as to how these services can be funded. It is intended that a proportion of funding will be sought through S106 contributions from developers.
Increased healthcare provision is only mentioned in the Garden City Suburb and South West Extension.	Residents	Healthcare provision has been analysed Borough-wide over the plan period. Gaps in provision have been identified in existing settlements as well as areas of new development. Requirements are set out clearly in INF4 Community Facilities.
Need for specialist services, residents are having to travel out for treatment at other hospitals.	Residents	Specialist services have been considered and continue to be considered by both the Council and its delivery partners. The Local Plan seeks to provide a range of healthcare facilities across the Borough as identified in Policy INF4 Community Facilities, allowing flexibility to respond to specific demand across the plan period.



## Theme 20: Accessibility, Transport and Infrastructure

No of responses Regulation 18 (Part 1)	10
No of responses Regulation 18 (Part 2)	1846
Total	1856

### Overview

The vast majority of responses received were from residents, Parish Councils and Members in relation to the lack of supporting infrastructure and the ability of existing infrastructure to cope with the amount and location of the proposed development as set out in the PDO.

### Key Issues

Respondents outlined a number of key issues including: How the PDO does not include enough sustainable methods of transport (including buses, trams, cycling routes and walking routes), the lack of infrastructure testing undertaken at the PDO stage, how the development of infrastructure needed to be in place before the development of any homes, the need to further develop the rail infrastructure across the Borough, how sustainable methods of transport should be included in the Local Plan and the need to reduce car dependency across the Borough and improve air quality.

### Conclusion

Having considered and taken into account all the representations received during the Regulation 18 consultations, the Council has worked extensively to ensure that the evidence base and the Proposed Submission Version Local Plan Policies are appropriate to respond to and deal with the issues raised around transport, supporting Infrastructure and the Highway network. The Council is also preparing its Local Transport Plan at the same time as the Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car. It is therefore considered that the Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the provision and delivery of infrastructure.

A summary of all issues under this theme and the Council's response to them are set out below in Table 20.

Table 20: Accessibility, Transport and Infrastructure –Issues and Responses

Issue	Respondent Type	Council Response
Highways England has no specific comments on the Council's evidence base other than the lack of evidence relating to transport and more in particular any consequences for the SRN. We appreciate the early stage of the process and thus the detail	Other stakeholders	In preparing the Proposed Submission Version Local Plan, Officers from departments of the Council have worked extensively with Highways England through the Duty to Cooperate process to ensure that the evidence base and the Submission Version Local Plan Policies are appropriate to protect and enhance the Local and Strategic Road Network.  Highways England will be aware that the



<p>required to gain this understanding will come at a later stage. However we would like to work with the Council, it's planning and transportation planning teams to understand any consequence to the SRN as a result of the level of growth envisaged as and when the options for the geographic spread and pace of development over the life of the plan has been formed. We support the aims of the Accessibility themes in Tables 4.1 and 4.2 in particular the sections covering the issues relating to; rising traffic volumes and congestion, increasing car use and dependency, high levels of out- and in-commuting in the Borough.</p>		<p>Warrington Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Submission Version Local Plan.</p>
<p>With new houses comes an increase in population which will worsen congestion.</p>	<p>Residents, elected representatives.</p>	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan. The results from the Model have confirmed that Warrington's transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements. The required supporting infrastructure to support the Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP).</p> <p>The Council's Local Transport Plan (LTP) has also been developed in parallel with the Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.</p>
<p>Many of the strategic planning issues that are being addressed by the Council for the development of the Borough cannot be fully assessed without</p>	<p>Developers/agents.</p>	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Submission Version Local Plan. The results from the Model have confirmed that</p>

<p>evidence on the infrastructure capacity. It is understood that the Council is currently developing a traffic model to test the Local Plan Core Strategy and the associated transport interventions required to support its delivery. This is crucial to allow the proper and sound evaluation of the all the key development options.</p> <p>The detailed information on the Community Infrastructure Levy would be of assistance at this stage to enable a strategic assessment of viability to be made. It is understood that it is the intention for this to run in parallel with the review of the Local Plan. We would suggest that this is an integral part of the evidence base and should be published as soon as possible.</p>		<p>Warrington’s transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements.</p> <p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council’s Infrastructure Delivery Plan (IDP).</p> <p>The Council’s Local Transport Plan (LTP) has also been developed in parallel with the Proposed Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.</p> <p>The Council is not currently progressing CIL in parallel with the Local Plan. However, a detailed viability assessment of the Proposed Submission Version Local Plan has been undertaken in line with national guidance, and this will be published ahead of the Proposed Submission Version Local Plan consultation.</p>
<p>Warrington’s existing roads cannot cope with the number of cars that exist currently, how will the infrastructure cope with the proposed development?</p>	<p>Residents, elected representatives</p>	<p>The Council’s Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan. The results from the Model have confirmed that Warrington’s transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements.</p> <p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council’s Infrastructure Delivery Plan (IDP).</p> <p>The Council’s Local Transport Plan (LTP) has also been developed in parallel with the Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.</p>

The villages do not have the infrastructure to cope with such rapid growth (e.g. Appleton, Appleton Thorn and Lymm).	Residents	<p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP). Significant new transport infrastructure is required to support the Garden Suburb Allocation in order to mitigate the impact on the existing road network.</p> <p>With regard to Lymm, the Proposed Submission Version Local Plan has limited the level of new development to ensure it is capable of being accommodated within the existing infrastructure capacity, without changing the character of the respective settlement, in a sustainable manner to ensure the viability and vitality of the Settlement over the Plan period.</p>
The Swing Bridges do not work efficiently, and an increase in boat traffic as part of the plans in the PDO will make this situation worse.	Residents	The Council is committed to working with Peel Ports to reduce the operation of swing bridges at peak times. It should also be noted that Western Link will provide a further high level crossing of the Ship Canal.
There is a concern that development will cause increased traffic problems at existing pressure points (e.g. the Cat and Lion junction).	Residents, elected representatives	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Submission Version Local Plan. The results from the Model have confirmed that Warrington's transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements.</p> <p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP). Significant new transport infrastructure is required to support the Garden Suburb Allocation in order to mitigate the impact on the existing road network.</p>
Concern that a lack of careful attention to infrastructure development	Residents	The Council's Local Transport Plan (LTP) has also been developed in parallel with the Proposed Submission Version Local Plan to

<p>will result in unsafe conditions for users of the road, especially pedestrians.</p>		<p>ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car. This gives specific consideration to issues of road safety.</p>
<p>Concerns over increased pollution from infrastructure plans. What considerations are there for this?</p>	<p>Residents, elected representatives</p>	<p>In support of the Plan making process, consultants were commissioned to validate the PDO approach in relation to air quality, and also assess the impacts at a local level of the Proposed Submission Version Local Plan on air quality. This work concluded that over the Plan period, air quality would improve through a package of measures, both local and nationally, over the Plan period. This study has informed policies in the Submission Version Local Plan.</p>
<p>Proposed new transport routes may compromise natural woodland, fields and wildlife. What considerations have been made for this?</p>	<p>Residents</p>	<p>Local designated sites and other important wildlife/habitat have been considered as part of the site assessment and Masterplanning process and have informed the development of the concept masterplans. Detailed discussions have been held with Natural England as part of this process. The vast majority of environmental assets will continue to be protected. Where an impact is unavoidable, the Proposed Submission Version Local Plan will require appropriate mitigation.</p>
<p>The Western Link cuts through Green Belt land and the TPT. Details of how this will relieve congestion are needed to justify such a development.</p>	<p>Residents</p>	<p>The Western Link Road business case has been prepared and consulted on outside of the Local Plan process.</p>
<p>Cycling routes and walking routes are lacking. An integrated network is needed to encourage sustainable travel. Why is there no mention of such infrastructure?</p>	<p>Residents, elected representatives</p>	<p>Agreed, sustainable travel is an important consideration for the Local Plan. The Council's Local Transport Plan has been developed in parallel with the Local Plan to ensure sustainable modes of transport are considered and included in Local Plan policies.</p> <p>It is considered that the policies in the Proposed Submission Version Local Plan are appropriate to facilitate the delivery of sustainable transport options.</p>
<p>Development of the Trans Pennine trail could affect an iconic bridge. The bridge</p>	<p>Residents</p>	<p>The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is</p>

<p>should be maintained in its current appearance.</p>		<p>recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.</p>
<p>On the TPT a light transit route (such as trams) on the existing railway line linking Warrington Town Centre with neighbouring areas with a swift, unfettered link would be supported.</p>	<p>Other stakeholders</p>	<p>The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.</p>
<p>The bus service/infrastructure is poor quality and does not at present discourage people from using their cars.</p>	<p>Residents</p>	<p>The Council is also preparing its Local Transport Plan at the same time as the Local Plan to ensure that new development promotes sustainable transport modes, including new and improved bus services, and contributes to the objective of reducing reliance on the car.</p>
<p>The Ship Canal and motorway cause significant problems to the traffic infrastructure in Warrington. This problem will increase with added cars from the proposed development. How will the proposed infrastructure in the PDO ensure that residents will not be detrimentally impacted?</p>	<p>Residents, elected representatives</p>	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan. The results from the Model have confirmed that Warrington's transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements. The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP).</p> <p>The Council's Local Transport Plan (LTP) has also been developed in parallel with the Proposed Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.</p>

<p>Warrington should make use of Park and Ride services. This is an opportunity to give Warrington a more sophisticated infrastructure program focusing on sustainable transport modes, from the PDO this opportunity does not seem to have been taken.</p>	<p>Residents</p>	<p>The Council's Local Transport Plan (LTP) has also been developed in parallel with the Proposed Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car. This does consider the role of Park and Ride, including at Warrington West and Birchwood train stations.</p>
<p>The New Runcorn bridge and Mersey Gateway tolls will cause traffic to divert through Warrington. Has this been considered in the PDO?</p>	<p>Residents, elected representatives</p>	<p>The Council has been monitoring key parts of its road network since before the opening of the Mersey Gateway to understand what impacts, if any, the imposition of tolls would have on traffic levels in Warrington. To date it appears from assessing the monitoring data from before and after opening, that the impact during the daytime has been marginal and raises no cause for concern. The monitoring will continue and, if trends change adversely, the Memorandum of Understanding the Council has with Halton Borough Council will allow discussion around potential mitigation measures to be had. The most notable increase in traffic on Warrington's road network following the introduction of the tolls is during the evening and overnight, where some significant percentage increases have been measured. However, as the traffic levels are very low during this period, the absolute numbers of additional vehicles is correspondingly low and does not cause any significant concern. Nevertheless, Warrington will be raising this matter with Halton Borough Council to understand if any measures can be taken to reduce these small increases.</p>
<p>Transport infrastructure needs to be in place before housing.</p>	<p>Residents, elected representatives</p>	<p>The Council agrees that infrastructure needs to be appropriately phased to support new development and to ensure that it does not result in an unacceptable impact on existing infrastructure. In particular there is the requirement for significant infrastructure to be provided to support the Plan's Main Development Areas.</p> <p>Where transport infrastructure delivery is required before development takes place, this is set out in the relevant policies of the Proposed Submission Version Local Plan and has been taken into account in preparing the draft Plan's development trajectory.</p>

<p>Pipe line infrastructure passes through the Borough and should be safeguarded from any development.</p>	<p>Other stakeholders</p>	<p>Agreed and reflected in the Proposed Submission Version Local Plan.</p>
<p>Opposed to the new high level strategic road which will require compulsory purchase of homes and it is likely to become a rat run.</p>	<p>Residents</p>	<p>The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.</p>
<p>The Eastern Link Road from M56 Junction 10 to the north of the Manchester Ship Canal (this route would cut through the proposed residential areas). This would provide a new HGV access road to the Barleycastle Treading Estate. It would provide an alternative route for traffic caught up in the problems on the M56/M6 motorways. This will result in the deterioration of the quality of life for current residents, how will this be mitigated?</p>	<p>Residents</p>	<p>The Garden Suburb will include appropriate road infrastructure which will include strategic and local road infrastructure. In addition connection points on to the existing road network will be improved where required. Public transport provision to south Warrington, and specifically to the Garden Suburb, will also be improved as part of the development proposals. Policy MD2 ensures that infrastructure will be delivered in a phased manner, with some of the more major road infrastructure required before development parcels can be released.</p> <p>The precise alignment of new road infrastructure will be confirmed through more detailed masterplanning work and will be subject to further consultation to ensure any impacts on existing residents are appropriately mitigated.</p>
<p>The “How shoots Link” from Grappenhall Heys to the M6 junction would effectively become an alternative HGV route for traffic coming to/from Warrington and Runcorn areas, leading to even more traffic flowing through the A49 and A56 in Stockton Heath.</p>	<p>Residents</p>	<p>A new distributor road link to support the Garden Suburb is a key requirement of Policy MD2. The Howshoots link was a proposal from the original New Town Plan and could form part of the distributor link. Policy MD2 establishes the principles of the link, but its precise alignment will be confirmed through more detailed masterplanning work and will be subject to further consultation.</p> <p>Separate consideration is being given to ensure appropriate access arrangements and infrastructure improvements are provided to support the employment designation within the Garden Suburb. This will also improve access arrangements for existing businesses in the area.</p>

<p>Warrington is already listed as the second most polluted area in the North West.</p>	<p>Residents, elected representatives</p>	<p>The majority of Warrington has good air quality and meets the national standards. There are though some locations, which the Council has declared Air Quality Management Areas, close to the major roads where the standards are exceeded. This is similar to other towns and cities of a similar size in the UK.</p>
<p>When the New Town Development Corporation published their proposals, their highway infrastructure was comprehensive. This is unlike the PDO transport infrastructure which shows a few vague lines on a map, with no indication of how roads would be connected to the existing network.</p>	<p>Residents, elected representatives</p>	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the highway implication of the proposed amount and location of development. The Council's Local Transport Plan (LTP) has also been developed in tandem with the Submission Version Local Plan.</p> <p>The PDO maps were high level illustrative maps of how an area might look and function. The detailed required supporting infrastructure for the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP). Further details on specific infrastructure will be confirmed as development proposals are advanced over the Plan Period.</p>
<p>Existing roads are over capacity. A ring road around the town is essential and the proposed new roads to the west and east should be regarded as the start of one.</p>	<p>Residents</p>	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan. The results from the Model have confirmed that Warrington's transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements. The required supporting infrastructure to support the Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP).</p> <p>The Council's Local Transport Plan (LTP) has also been developed in parallel with the Proposed Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.</p>
<p>The transport summary by AECOM 2017 cites increasing rail patronage as a 'strength'</p>	<p>Residents</p>	<p>It is considered that there is no conflict between the Report's findings and the proposed development in the south of the</p>



<p>and the new Warrington West station would support greater levels of residential and commercial development as an 'opportunity'. The location of such large development to the south of Warrington conflicts with findings from this document as this is clearly not capitalised on.</p>		<p>Borough. The west of the Borough has, and continues to be subjected to residential and Commercial development. The new Warrington West Train Station will support new and historical growth.</p> <p>A range of transport infrastructure improvements are proposed to support new development in the south of Warrington, including improving links to the Town Centre its railway stations.</p>
<p>Development should be phased, but only after the road infrastructure is in progress and when investment funds for schools, shops, leisure and district centres are confirmed.</p>	<p>Residents, elected representatives</p>	<p>The allocation policies in the Proposed Submission Version Local Plan include specific clauses to ensure that the phasing of new development is link to the delivery of supporting transport and social infrastructure.</p>
<p>Travel by road in South Warrington is dominated by the three roads (A50, Knutsford Road; A49, London Road; A56, Chester Road), all of which cross the MSC on two-lane Victorian swing bridges. This means that there is frequent congestion at the crossing points and congestion is certain to get worse.</p>	<p>Residents</p>	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Submission Version Local Plan. The results from the Model have confirmed that Warrington's transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements.</p> <p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP). It should be noted that Western Link will provide a further high level crossing of the Ship Canal.</p>
<p>There has been no assessment and or modelling of infrastructure for highways, footpaths, electricity generation, waste disposal, sewage treatment, schools, hospitals, Doctors and so on. There also needs to be the relevant amenities in place with the development of houses.</p>	<p>Residents, elected representatives, neighbouring Councils</p>	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan.</p> <p>The transport infrastructure and wider social infrastructure required to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP). The IDP has been prepared in liaison with the necessary infrastructure providers,</p>

		both internal Council departments and external organisations.
Warrington has an unusually high level of car ownership, without substantial investment in other reliable infrastructure means the traffic situation will worsen.	Residents, elected representatives	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan. The results from the Model have confirmed that Warrington's transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements.</p> <p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP).</p> <p>The Council's Local Transport Plan (LTP) has also been developed in parallel with the Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.</p>
Objection to new Strategic Road to the East of A50 as it will not alleviate traffic issues. Alternatives include: better utilisation of public transport, new trams/rail, development of existing infrastructure on A50/A56/A49/Broad Lane/Ackers Road.	Residents	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.
The cost of increased traffic as a result of the PDO on lost productive time is hugely significant and will impact many businesses.	Other stakeholders	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan. The results from the Model have confirmed that Warrington's transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements.</p> <p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP).</p>

		<p>The Council's Local Transport Plan (LTP) has also been developed in parallel with the Proposed Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.</p>
<p>Evidence available says that building more roads does not in the end reduce congestion; it merely adds more cars to the area. Has this been considered?</p>	<p>Residents</p>	<p>The Council's Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Proposed Submission Version Local Plan. The results from the Model have confirmed that Warrington's transport network can accommodate the level of growth proposed in the Plan, subject to a number of transport infrastructure improvements.</p> <p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP).</p> <p>The Council's Local Transport Plan (LTP) has also been developed in parallel with the Proposed Submission Version Local Plan to ensure that new development promotes sustainable transport modes and contributes to the objective of reducing reliance on the car.</p>
<p>The proposed road at Latchford crossing and the Manchester Ship Canal, is unbelievably short-sighted and will simply drop more and more traffic into central Warrington.</p>	<p>Residents</p>	<p>The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.</p>
<p>There is no rail or tram service serving south Warrington.</p>	<p>Residents, elected representatives</p>	<p>Given the limited opportunity for rail links in this area, bus services will be improved between the South Garden Suburb and the town centre, as well as the proposed employment site. The introduction of a mass transit system is a long term objective of the draft Local Transport Plan and this will</p>

		<p>reviewed as the development progresses and as the Local Plan is reviewed in due course. Flexibility has been built into the masterplan to allow proposed roads to be used by various modes of transport to ensure that travel needs can be fully met over time.</p>
<p>Highways England's Initial modelling work suggests that the level of growth set out in the WLP PDO could have a significant impact on the SRN. This serves to highlight the need for the development of a realistic, robust transport evidence base and mitigation strategy at the earliest opportunity.</p> <p>Highways England has concerns regarding the limited transport evidence base and/or proposals for strategic transport infrastructure provided to date. In the absence of this evidence base, we have some concern that site allocations and mitigation are being proposed in the absence of a wider understanding of their cumulative impacts on the SRN around Warrington. At this stage of the Plan Making process Highways England consider that there should be greater certainty over the required highway infrastructure improvements, including where and when they are required, who is responsible for delivering them, and how they will be funded. The transport evidence base should include consideration of thresholds for development and associated highway impacts, demonstrating the level of highways impact associated</p>	<p>Other stakeholders</p>	<p>In preparing the Proposed Submission Version Local Plan, Officers from departments of the Council have worked extensively with Highways England through the Duty to Cooperate process to ensure that the evidence base and the Submission Version Local Plan Policies are appropriate to protect and enhance the Local and Strategic Road Network.</p> <p>Highways England will be aware that the Warrington Multi Modal Transport Model (2016) has been developed to test the implications of the proposed amount and location of development as set out in the PDO and the Submission Version Local Plan.</p> <p>The required supporting infrastructure to support the Proposed Submission Version Local Plan is set out in the Council's Infrastructure Delivery Plan (IDP).</p> <p>A detailed Transport evidence base has been compiled to support the Proposed Submission Version Local Plan.</p>

<p>with phases of development. The evidence base and subsequent IDP should then identify an appropriate phased mitigation strategy to address identified impacts, both on the local and strategic highway networks.</p>		
<p>Who will fund the required infrastructure, as it is not clear who will be responsible and what funding streams will be used?</p>	<p>Residents, elected representatives</p>	<p>The Council's Infrastructure Delivery Plan (IDP) sets out the required infrastructure to support to proposed levels of growth and who will be responsible for funding. Funding will come from a variety of streams, one of which will be developer contributions through the planning application process.</p>

## Theme 21: Ship Canal Crossing

No of responses Part 1	0
No of responses Part 2	545
<b>Total</b>	<b>545</b>

### Overview

The level of response on this matter was fairly significant owing to an illustrative line marked on a plan in the PDO document which understandably created concern and confusion. The majority of responses came from residents, with some also from councillors and stakeholder.

### Key Issues

Respondents generally objected to the Ship Canal Crossing due to the loss of its use by residents, impact on noise and air quality, perceived loss of people's properties, impact on the wider road network with potential to cause further congestion and impact on the wildlife. In addition it was noted that the proposed route was not backed up by enough information including financial and traffic modelling and it was highlighted that further work was required.

There was also some recognition that an additional high level crossing over the ship canal was required, particularly with the level of development proposed in south Warrington.

### Conclusion

The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.

Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.

A summary of all issues under this theme and the Council's response to them are set out below in Table 21.

Table 21: Ship Canal Crossing – Issues and Responses

Issue	Respondent Type	Council Response
There will be increased noise and air pollution which will impact the health and wellbeing of residents.	Residents, Other stakeholders	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing,

		including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.
Where the new route will be located, house prices will decrease and homes will be lost.	Residents	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.
Traffic could potentially join existing pinch points. There is potential for surrounding traffic diverting to use this new route (The Ship Canal Crossing) as an alternative to paying tolls on roads and when there is congestion on the nearby motorways.	Residents	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on

		users of the TPT.
Loss of the Trans Pennine Trail will mean the loss of a valuable amenity resource and recreational route.	Residents, elected representatives	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.
The requirement for a new high level crossing over the ship canal is essential and not optional.	Elected representatives	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.
Loss of the TPT will result in harm to wildlife with the loss of habitats.	Residents, other stakeholders, elected representatives	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to



		be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.
Loss of the TPT will be harmful to the character of the areas it currently contributes positively to.	Residents, elected representatives	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.
There appears to have been no assessments conducted e.g. no engineering feasibility assessment has been carried out and there are also no transport models to look at the overall scheme.	Elected representatives, developers/agents	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.
A tram line should be considered instead of another road (potential dual carriageway). The cycle way should also be safeguarded.	Residents	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship

		canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.
The existing route is not wide enough for a dual carriageway without significant development scale and cost.	Residents	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.
There is no business or financial model for the proposed route.	Elected representatives	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.
Alternative routes are not discussed. There are many other areas in	Residents, developers/agents	The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed

<p>South Warrington where an additional crossing of the Ship Canal Crossing could be completed with little disruption to homes.</p>		<p>Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.</p>
<p>The TPT is essential to the community of Warrington and supports tourism.</p>	<p>Residents</p>	<p>The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.</p>
<p>The plan does not take into account future technology such as connected and autonomous vehicles. In the near future such infrastructure (The Ship Canal Crossing) may not be necessary.</p>	<p>Residents</p>	<p>The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.</p>

		<p>Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.</p>
<p>The Manchester Ship Canal is a flood plain, development could potentially cause more flooding in the area.</p>	<p>Residents</p>	<p>The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.</p>
<p>The development would create a “massive eyesore”.</p>	<p>Residents</p>	<p>The Council is not proposing the use of the TPT to serve the Garden Suburb in the Proposed Submission Version Local Plan. Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon. Part of the TPT is likely to need to be diverted as part of the Western Link Proposals but this will be done sensitively to ensure that there will be minimal impact on users of the TPT.</p>

## Theme 22: Western Link

No of responses Part 1	0
No of responses Part 2	104
<b>Total</b>	<b>104</b>

### **Overview**

A large number of residents raised concerns with the Western Link. It should be noted that the Western Link was subject to a separate consultation undertaken by the Council and a number of issues raised during the PDO consultation were considered as part of the Western Link consultation. It should also be noted that at the time of the PDO consultation, the final alignment of the Western Link had not been confirmed.

### **Key Issues**

A large number of residents objected to the Western Link raising a number of key issues including: the impact on residents' homes, loss of wildlife corridors/leisure space, the negative impact on the environment including increased pollution causing harm to health and the potential of the link to encourage traffic to come through Warrington to avoid the motorway/toll bridges.

There was some support for the Western Link from a smaller number of respondents who outlined how the development would reduce congestion in Warrington.

Residents, Councillors and developers promoting sites elsewhere in the borough questioned the deliverability of the Western Link and what would happen to the Plan if the Western Link is not built, given how much development proposed in the Plan is dependent on it. There were also concerns that the development trajectory was too optimistic in terms of the lead in times for the delivery of the Western Link.

### **Conclusion**

The Council remains fully committed to the Western Link and is confident the Western Link will be delivered.

The Council accepts that there needs to be appropriate safeguards within relevant allocation policies to coordinate the development with the delivery of the Western Link. The Council has therefore amended the development trajectory for sites dependent on the Western Link to ensure it reflects the latest programme for construction of the road. The respective allocation policies are explicit that development on these sites cannot come forward until funding has been secured and a programme of construction has been confirmed for the Western Link. There is also a review mechanism in the Plan in the event that critical infrastructure such as the Western Link is delayed or does not come forward.

A summary of all issues under this theme and the Council's response to them are set out below in Table 22.

**Table 22: Western Link –Issues and Responses**

Issue	Respondent Type	Council Response
The proposed route, size and nature of the road	Residents	At the time for the PDO consultation the final route for the

<p>does not appear certain and it is not available to view on the maps in the PDO.</p>		<p>Western Link had not been confirmed. A general alignment was therefore shown in the PDO documentation rather than a definitive route.</p>
<p>The new road will have significant environmental impacts including: loss of areas of open space; impact on wildlife; impact on residential amenity; and generation of additional pollution and noise.</p>	<p>Residents</p>	<p>The Western Link was subject to a separate consultation which considered these issues.</p>
<p>The new road will not address congestion elsewhere in the borough and may result in additional traffic looking to avoid the Mersey Gateway toll.</p>	<p>Residents</p>	<p>The Western Link was subject to a separate consultation which considered these issues.</p>
<p>The purpose of the road is to open up land for development rather than to address congestion. Any congestion relief provided by the road will be lost due to additional traffic generation from new development.</p>	<p>Residents</p>	<p>The impact on new development on the Western Link has been assessed as part of the Council's Transport Modelling work in support of the Proposed Submission Version Local Plan.</p>
<p>There is support for the Western link as it will help to alleviate problems around the Bridge Foot roundabout.</p>	<p>Residents</p>	<p>The Western Link was subject to a separate consultation which considered these issues.</p>
<p>The Council needs to have more certainty in relation to the funding of the Western Link.</p>	<p>Residents, developers/agents</p>	<p>The Council is confident the Western Link will be delivered.</p> <p>The development trajectory for sites dependent on the Western Link have been updated to ensure it reflects the latest programme for construction of the road.</p> <p>The respective allocation policies are explicit that development on these sites cannot come forward until funding has been secured and a programme of construction</p>

		<p>has been confirmed for the Western Link.</p> <p>There is a review mechanism in the Plan in the event that the Western Link is delayed or does not come forward.</p>
<p>The plan assumes that the Western Link will go ahead and is dependent on it for much of the proposed development. What happens if this does not go ahead?</p>	<p>Residents, elected representatives</p>	<p>The Council is confident the Western Link will be delivered.</p> <p>The development trajectory for sites dependent on the Western Link have been updated to ensure it reflects the latest programme for construction of the road.</p> <p>The respective allocation policies are explicit that development on these sites cannot come forward until funding has been secured and a programme of construction has been confirmed for the Western Link.</p> <p>There is a review mechanism in the Plan in the event that the Western Link is delayed or does not come forward.</p>
<p>The lead in times assumed for the Waterfront need to be adjusted to reflect the realities of delivering major infrastructure such as the Western Link.</p>	<p>Developers/agents</p>	<p>The development trajectory for sites dependent on the Western Link have been updated to ensure it reflects the latest programme for construction of the road.</p> <p>The respective allocation policies are explicit that development on these sites cannot come forward until funding has been secured and a programme of construction has been confirmed for the Western Link.</p>
<p>Any new crossings over the ship canal (such as the Western Link) should not result in any restriction on boats.</p>	<p>Residents</p>	<p>The Western Link was subject to a separate consultation which considered these issues.</p>
<p>Opportunity to use spaces for recreational use</p>	<p>Other stakeholders</p>	<p>The Council is working with local sports organisations to improve existing facilities and to provide new facilities through its work on</p>

		the Local Plan and its Playing Pitch Strategy.
The implications of the final alignment of the Western link need to be understood in order to ensure the most efficient use of potential development sites.	Developers/agents	The proposed alignment has been taken into account in respect of proposed allocation sites.



## Theme 23: Scale of Development in South Warrington

No of responses Part 1	0
No of responses Part 2	221
<b>Total</b>	<b>221</b>

### Overview

There was a large response on the level of development proposed for south Warrington. Responses on this matter were largely from residents, with some comments from developers, agents and councillors. Comments from agents and developers were more positive regarding development in the south of the Borough.

### Key Issues

Respondents generally commented on the scale of proposed development in south Warrington and how it is disproportionate with that proposed in the rest of the Borough. The sustainability of development in the south was questioned due to existing levels of congestion, poor public transport links and poor levels of existing infrastructure. Some respondents accepted that a level of development in south Warrington would be required to meet the needs of the Borough but they consider that the quantum proposed will be detrimental to existing communities and the environment.

Of the submissions from developers and agents, they were generally supportive of development in south Warrington and considered it a sustainable location for large scale development.

Responses from residents generally objected to the scale of the proposals, the significant lack of infrastructure, loss of heritage assets, loss of character of existing villages, congestion, impact on open space and wildlife and poor links over the ship canal and back to the town centre. Concern was also raised in relation to inadequate social infrastructure to supporting the proposed new communities.

Respondents generally wanted to see a fairer spread of development across the Borough.

### Conclusion

Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan

Having undertaken this work and taken into account the representations, the Council considers the general locations for development in south Warrington, as presented in the PDO, to be sustainable and these have largely been carried forward into the Proposed Submission Version Local Plan. There has been some refinement to the scale of proposed development and also to the areas previously proposed for Green Belt release. These have been as a result of changes to Warrington's housing requirement, detailed consideration of Green Belt boundaries and more detailed work on delivery rates for large developments.

Generally the Council considers that with significant infrastructure investment, proposed development in south Warrington will be sustainable and beneficial to both south Warrington and to the Borough as a whole.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 23.

Table 23: Scale of Development in South Warrington – Issues and Responses

Issue	Respondent Type	Council Response
Concern regarding environmental impacts of significant development in south Warrington.	Residents, Other stakeholders	The Council recognises that with significant development there will be impacts on the environment. In response to this the Council has been working closely with stakeholders and partners to ensure that the impact of development will be minimised and can be mitigated wherever possible. Indeed Natural England now requires a net gain in biodiversity with all development and this will need to be reflected within future detailed masterplans and proposals for individual development plots. Policies MD2 (Garden Suburb), MD3 (South West Extension) and DC4 (Natural Environment) address this issue and set out clear requirements.
Concern about the impact of new development proposals on small independent shops.	Residents	Any retail development in south Warrington will be small scale and will be to support new and existing communities rather than being a large scale shopping destination. Proposals include the provision of local retail facilities in local and neighbourhood centres which will provide for local needs rather than competing with existing small independent shops. The scale of retail development is specified clearly in policies MD2 and MD3. Any larger scale development which comes forward will be subject to detailed assessment and sequential testing as set out in Policy DEV5 (Retail and Leisure Needs).
Concerns about lack of strategic road infrastructure and existing traffic levels/poor road infrastructure.	Residents	The Council is aware of existing problems of congestion in South Warrington. The proposed developments will enable the delivery of new major strategic road infrastructure which would not otherwise be deliverable, bringing significant

		<p>improvements to the transport network in the south of the Borough. In addition, public transport links will be improved.</p> <p>The allocation policies have clear phasing requirements to ensure the timely delivery of infrastructure to support new development.</p>
Concerns about impact on social infrastructure in south Warrington.	Residents	<p>During the preparation of the Local Plan, various team within the Council, together with external delivery partners, have collaborated to ensure that social infrastructure will be adequately provided for as part of the proposed development. We recognise that this is an essential part of the delivery of sustainable communities. A detailed assessment has been made to establish the needs over the plan period in relation to schools, health facilities, community/cultural facilities, parks and play areas, amongst others.</p> <p>The allocation policies also have clear phasing requirements to ensure the timely delivery of infrastructure to support new development.</p>
Concerns about costs and timely delivery of infrastructure in south Warrington.	Residents, other stakeholder	<p>The Council will ensure the timely delivery of infrastructure through legal agreements with landowners and also the policy wording in policies MD2 and MD3 is such that infrastructure must be in place before residential or other development can take place.</p> <p>The Council has also undertaken a Local Plan Viability Assessment to ensure that all allocations in the Local Plan are viable.</p>
South Warrington will receive an unfair amount of development compared to other parts of the Borough.	Residents	<p>Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the Proposed Submission Version Local Plan</p> <p>Having regard to various assessments, including the Green Belt Assessment (2016), it has been concluded that the</p>

		proposed urban extensions in south Warrington were the most sustainable locations to direct new major development. This is of course part of the wider strategy for the Borough which includes prioritising the development of land within the existing urban area as a starting point, seeing major development at the Waterfront/Port Warrington and delivering some development to the settlements outside of the main urban area.
Poor public transport provision in south Warrington.	Residents, elected representatives	The significant levels of development being directed to south Warrington will generate funding for improved public transport facilities. This is a key priority for the Council.
Concerns about devaluation of existing properties.	Residents	Noted. This is not a planning matter.
Concerns about increase in traffic in Stockton Heath – congestion and parking issues.	Residents	The Council is aware of existing congestion in Stockton Heath and issues of parking. Stockton Heath is a successful destination in its own right and management of this is important. Improvements to strategic road infrastructure in south Warrington will help to alleviate traffic on A49.
Concerns regarding pressure on services in Lymm.	Residents	Existing services in each of the settlements have been assessed as part of the process of deciding on Warrington’s spatial strategy over the next 20 years. Development to the settlements has been determined based upon the level of capacity of services and infrastructure as well as specific characteristics of the settlements. The potential to expand and improve existing services has also been analysed. The Council is also in close dialogue with the Lymm Neighbourhood Plan Group to ensure that aspirations for the settlement are being reflected in the local plan. There is an identified need for additional primary school capacity in Lymm as well as a new health facility. These will be addressed through the delivery of new development. (See Policies OS5-OS8).
Concerns character of south Warrington and existing	Residents	The Council is aware that the level of development proposed in south

<p>villages will be changed.</p>		<p>Warrington will alter the character of some areas in this part of the Borough. Clearly areas where Green Belt boundaries are to be altered will see the greatest level of change. However, within the masterplanning work which has been carried out to date to inform the Proposed Submission Version Local Plan, the protection of existing areas, including specific environmental and heritage assets, and the creation of new areas which complement these has been a fundamental part of the process. The wording within policies MD2 and MD3 for the urban extensions sets out clear parameters as to how existing areas should be protected in more detailed design work. This will also ensure that development will not result in urban sprawl.</p>
<p>Concerns over impact on loss of heritage in south Warrington.</p>	<p>Residents</p>	<p>The Council has carried out detailed Heritage Impact Assessments for all of the proposed allocation sites in the Local Plan, including for the allocation sites in the settlements. The content of the assessments has been agreed in dialogue with Historic England who have fed back comments and we have ensured that any concerns can be addressed through the requirements of the allocation policies. The Council is confident that the proposed development will not result in a loss of heritage which is extremely important in south Warrington.</p>
<p>Proposals for major development in south Warrington will produce isolated communities which have no link or benefit to the town centre. Green Belt will be sacrificed for no gain.</p>	<p>Residents, elected representatives</p>	<p>Ensuring that new development in south Warrington benefits the town centre and the Borough more widely is a key objective of the Council. The improvement of physical transport links to the town centre and wider Borough is a priority as part of the development of the Garden Suburb and the South West extension. In addition, there is a drive to improve the offer of Warrington town centre which is already partly underway with the Times Square development. The Proposed Submission Version Local Plan seeks to build upon this so that the town centre's cultural, retail and leisure offer is much improved over the plan</p>

		period. The Council is confident that proposals in south Warrington will bring Borough-wide benefits.
Concern for local businesses in Lymm.	Residents	Proposals in Lymm will not be detrimental to local businesses and on the contrary could bring benefits with an increasing residential population. The Council continues to work closely with Lymm Neighbourhood Plan Group who have highlighted the need for small scale business units for local businesses. This is something that has been included in Policy DEV4.
Concerns regarding increased haulage/freight and industry in south Warrington.	Residents	With the location of a major new employment site proposed in south Warrington there will inevitably be an increase in traffic associated with this development. However, significant strategic road infrastructure improvements will be made to support the development. In addition, the employment area in the Garden Suburb has been located immediately adjacent to the motorway network which is preferable for both operators/businesses and local residents in terms of minimising any impacts on residential amenity. The expansion of further employment opportunities at Port Warrington will bring a multi-modal port facility adjacent to the Manchester Ship Canal.
Concern for the destruction of existing communities.	Residents	Proposed development in south Warrington is not intended to destroy existing communities but to strengthen them and protect them where appropriate. For example, in the Garden Suburb, Grappenhall Heys will be added to in a sensitive and positive manner, bringing enhanced local facilities making it a more sustainable residential environment. Appleton Thorn is different in nature and will be protected so that it remains a settlement in its own right, with appropriate green buffers to ensure existing and new settlements do not merge. This is made clear in policy MD2 and will need to be carried through to more detailed masterplanning work.
Support for development in south Warrington as a	Developers/agents	Noted. This reflects the detailed studies that the Council has commissioned or

sustainable development location.		carried out.
Concerns about loss of green space and impact on landscape.	Residents	Significant amounts of green space will be provided in the urban extensions to be located in south Warrington. During the masterplanning stage which has informed the Proposed Submission Version Local Plan, the provision of a large proportion of green space has been deemed to be crucial to the sensitive delivery of the sites. This has been considered alongside biodiversity and leisure considerations with more detailed work required at the next stage of masterplanning. As a result it is considered that south Warrington will benefit from an overall enhanced and accessible green space offer. Details of green infrastructure are explicit in policies MD2 and MD3.
New canal crossing required for south Warrington.	Residents	This continues to be explored by the Council, yet for the purposes of the Proposed Submission Version Local Plan no route has been defined. This will be dealt with fully in a further review of the Local Plan in due course.
No major centres of employment in south Warrington.	Residents	Warrington has seen significant employment growth in recent years, most notably at Omega and continued growth at Birchwood which are both located on major motorway networks. South Warrington provides another key opportunity for further employment growth, at the intersection of the M56 and M6. Locating major new employment sites close to existing motorways is beneficial for both businesses and existing residents. In the Council's assessments made through the EDNA, land within the Garden Suburb emerged as a sustainable employment location in the Borough. This is reflected in Policy DEV4 Economic Growth and Development.
Affordable housing should be applied universally across the Borough at the same level, including in south Warrington.	Residents	The Council is fully committed to the delivery of affordable housing across the Borough. However, there are marked differences in the property market with particularly high values in south Warrington. It is crucial therefore that we seek to ensure that affordable

		<p>housing in south Warrington is genuinely affordable and not subject to an arbitrary reduction. It is also the case that land values in south Warrington mean that a higher level of affordable housing provision is generally more viable than say in Inner Warrington. It is for these reasons that the Council has sought to apply a spatially based and flexible approach to the provision of affordable housing, due to the stark variations in Warrington's housing market. This is reflected in Policy DEV2 (Meeting Warrington's Housing Needs).</p>
<p>Creation of new communities dependent on car for commuting to Manchester/Liverpool.</p>	<p>Residents</p>	<p>With recent and anticipated future increases in economic investment in the Borough, the aim is to reduce the need for out-commuting for employment purposes. There will always be out-commuting to cities for a large proportion of employment, and Warrington has the benefit of being close to several cities, however the Proposed Submission Version Local Plan seeks to ensure that as many options as possible are available to encourage sustainable modes of transport.</p>



## Theme 24: Air Quality

### Air Quality

No of responses Regulation 18 (Part 1)	<u>2</u>
No of responses Regulation 18 (Part 2)	<u>690</u>
Total	<u>692</u>

#### Overview

A number of respondents, including Member of Parliament, Parish Councils and Councillors, Ward Councillors, residents, Stakeholders and statutory Consultees raised the issue of the already existing poor air quality in the Borough and further reductions in air quality with regards to the amount and location of development as proposed in the Preferred Development Option (PDO 2017). The majority of the representations received during the consultations were from residents.

#### Key Issues

Key issues from respondents include: how the loss of Green Belt will further increase poor air quality; how an increase of 24,000 homes will potentially result in an extra 50,000 cars using the roads of Warrington, worsening the already poor air quality in the Borough; there is no commitment in the PDO with regards to the reduction of air quality and how this will be addressed, there is no mention of an enhanced strategy to reduce co2 emissions, the lack of work undertaken by the Council to assess and understand the impacts of poor air quality on the residents' of the Borough and lastly, there is no promotion of sustainable forms of transport/joined up thinking to address poor air quality and reduce car dependency as a mode of transport.

#### Conclusion

Having considered and taken into account all the representations received, the Council has worked extensively to ensure that the evidence base and the Proposed Submission Version Local Plan Policies are appropriate to protect and enhance the Borough's air quality. It is therefore considered that the Submission Version Local Plan sets out a clear policy approach and guidance on how proposed development should respond to the impacts of air quality.

The Council's Air Quality Action Plan sets out a specific action for the Submission Version Local Plan to consider policies to improve air quality. The Proposed Submission Version Local Plan includes a specific section on air quality within the Environmental Protection Policy ENV10. To consider the impact of the Proposed Submission Version Local Plan on air quality, a Borough wide air quality assessment has been produced as part of the evidence to look at the potential impacts from the additional housing and associated traffic. To ensure consistency, the Council is preparing a new Local Transport Plan (LTP4) which includes measures to improve air quality, ensuring a joined up policy approach for the Submission Version Local Plan with the Local Transport Plan and the Air Quality Action Plan.

A summary of all issues under this theme and the Council's response to them are set out below in Table 24.

Table 24: Air Quality - Issues and Responses

Issue	Respondent Type	Council Response
No surveys or studies have been carried out	Residents, elected representatives,	The PDO consultation formed part of the first stage of the Plan making process, and highlighted

<p>to assess and understand the impacts of the PDO and the amount of development proposed on air quality, for example along London Road and Stockton Heath and in Latchford, Thelwall and the south (WA4) of the Borough in general. How will emissions be assessed, as air quality is already an issue in the Borough, without even more development?</p>	<p>developers/agents, other stakeholders</p>	<p>potential broad areas for growth across the Borough. In support of the next stage of the Plan making process, consultants were commissioned to validate the PDO approach in relation to air quality, and also assess the impacts at a local level of the Proposed Submission Version Local Plan on air quality. An electronic copy of the AECOM Technical Report and executive Summary: Local Plan Air Quality Modelling Report is available on the Council's Local Plan Evidence Base web page. In addition, the Council has a comprehensive air quality monitoring network and produces Annual Status Reports on air quality. This is used to assess long term trends in changes in air quality. The impacts on air quality have also considered through the SA/SEA process of the Proposed Submission Version Local Plan.</p>
<p>4.8% of all deaths are caused by man-made particulate pollution this is equal to 95 unnecessary deaths a year in the Borough. Development will only increase this number. How will this be addressed?</p>	<p>Residents, elected representatives</p>	<p>In support of the next stage of the Plan making process, consultants were commissioned to validate the PDO approach in relation to air quality, including concentrations of fine particulates, and also assess the impacts at a local level of the Proposed Submission Version Local Plan on air quality. An electronic copy of the AECOM Technical Report and executive Summary: Local Plan Air Quality Modelling Report is available on the Council's Local Plan Evidence Base web page. The Council has produced an Air Quality Action Plan which sets out a series of measures to try to improve air quality, specifically within problem areas but also across the wider Borough. The impacts on air quality have also considered through the SA/SEA process of the Proposed Submission Version Local Plan.</p>
<p>WBC has the second highest pollution rates in North West (World Health Organisation Study 2016) which by WBC's own admission, exceeds the targets for maximum air pollution by 60%. Development will only increase this and put further strain on the NHS.</p>	<p>Residents, elected representatives</p>	<p>The majority of Warrington has good air quality and meets the national standards. There are though some locations, which the Council has declared Air Quality Management Areas, close to the major roads where the standards are exceeded. This is similar to other towns and cities of a similar size in the UK. There are no areas to the Council's knowledge that exceed the national standards by 60%. In addition, we are not one of the 33 local authorities that have been mandated by the Government to provide action plans due to their levels of pollution.</p>
<p>Concentrate development in existing urban areas and consider Compact City</p>	<p>Elected representatives</p>	<p>There will be approximately 13,500 new homes developed within the existing urban areas of the Borough and the focus of the Plan is still to regenerate the Town Centre and Inner Warrington,</p>

<p>model which is not car reliant to improve air quality.</p>		<p>where good multi-modal transport links exist. However, the urban area cannot accommodate all of the growth proposed by the Council. Development densities have been optimised to reflect the location of development to services within the existing urban area.</p>
<p>Air quality will worsen across the Borough with the growth in population as a result of the proposed development. A clear strategy should be set by WBC to control pollution levels, there has been no joined up thinking.</p>	<p>Residents, elected representatives</p>	<p>The impact of the proposed development on air quality has been assessed by consultants and modelling work concluded that over the Plan period, air quality would improve through a package of measures, both local and nationally, over the Plan period. An electronic copy of the AECOM Technical Report and executive Summary: Local Plan Air Quality Modelling Report is available on the Council's Local Plan Evidence Base web page. The Council has produced an Air Quality Action Plan which sets out a series of measure to improve air quality. This is supported by measures within the Local Transport Plan (LTP4) and policies in the Submission Version Local Plan, for example Policy INF1 Sustainable Travel and Transport.</p>
<p>Green Belt provides an important protection against the pollution coming from the motorways surrounding Warrington. The PDO would effectively remove this protection with development over such a significant area.</p>	<p>Residents, elected representatives</p>	<p>As part of the Masterplanning process, motorway and main road buffers and set back distances have been included in the design and layout of the proposed areas of development within the south east and south west of the Borough to mitigate the impacts of poor air quality.</p>
<p>Question the wisdom of locating large scale residential development so close to the intersection of two major motorways on the basis of air quality impact.</p>	<p>Residents, elected representatives, developer/agents</p>	<p>Whilst air quality is one important consideration in the Plan making process, it is not the only factor. The Submission Version Local Plan evidence base and Sustainability Appraisal have concluded that this wider south east location is the most sustainable as a whole. It should also be noted that development proposed to be located close to the motorway intersection is predominately locationally specific employment and distribution development.</p>
<p>If air quality had been a criterion for site selection (given PDO Objective W6), the SE Extension would have been ruled out.</p>	<p>Residents, elected representatives</p>	<p>Whilst air quality is one consideration in the Plan making process, it is not the only factor. However, air Quality was considered as part of the site selection methodology, Masterplanning work and Sustainability Appraisal/Strategic Environmental Assessment process of the Proposed Submission Version Local Plan.</p>
<p>Increased air pollution will result from the new infrastructure e.g. The</p>	<p>Residents, elected representatives</p>	<p>The Ship Canal crossing shown as part of the south east concept diagram was an indicative transport route showing how an additional high level route</p>

<p>Ship Canal Crossing in Latchford using the TPT.</p>		<p>crossing over the Manchester Ship Canal could be considered.</p> <p>Whilst it is recognised that a further crossing over the ship canal may be necessary in time, the details of any crossing, including the mode of transport the crossing would support, are as yet unknown. Any planned crossing would require a review of the Local Plan at which point full details would be consulted upon.</p>
<p>If Environmental charges are introduced for Manchester, Warrington should follow suit and make the centre of Warrington a zero emission zone to prevent an influx of displaced high-emission vehicles.</p>	<p>Residents</p>	<p>There is a commitment in the Council's Air Quality Action Plan (2017-2022) to commission a Clean Air Zone Study, to explore the feasibility of potentially charging the most polluting vehicles that enter this Clean Air Zone, should one be implemented by the Council.</p>
<p>No consideration for sustainable transport options which would improve air quality, the PDO is over reliant on road transport (this is evident from the new multi storey car park in the Town Centre).</p>	<p>Residents</p>	<p>The Council has produced an Air Quality Action Plan which sets out a series of measure to improve air quality. This is supported by sustainable transport measures within the Local Transport Plan (LTP4) and sustainable policies in the Proposed Submission Version Local Plan, for example Policy INF1 Sustainable Travel and Transport.</p>
<p>Huge Traffic problems in Warrington, these are likely to be exacerbated when the new toll bridge opens between Runcorn and Widnes, and drivers choose to come through Warrington town centre to avoid toll charges, pollution will only worsen causing impact on the health of the population.</p>	<p>Residents</p>	<p>Since the opening of the Mersey Gateway, monitoring has been undertaken by the Council to assess the potential number of additional vehicles coming through Warrington as a result of the new toll being introduced. Monitoring will continue to be carried out and evaluated.</p>
<p>Realistically, Warrington couldn't reduce pollution with a congestion zone because the motorways are such an integral</p>	<p>Residents</p>	<p>Comment noted. However, it should be noted that as part of the Local Plan Duty to Cooperate process, Officers of the Council have been working closely with personnel from Highways England to understand the relationship between the Strategic Road Network and the proposed levels of growth as</p>

part of the problem.		set out in the Proposed Submission Version Local Plan.
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## Theme 25: Flood Risk

No of responses Regulation 18 (Part 1)	<b>3</b>
No of responses Regulation 18 (Part 2)	<b>195</b>
Total	<b>198</b>

### Overview

A number of respondents, including Parish Councils and Councillors, Ward Councillors, Residents, Stakeholders and Statutory Consultees raised the issue of flooding in the Borough and the risk of further flooding due to the amount and the location of development, as proposed in the Preferred Development Option (PDO 2017). The majority of the representations received during the consultations were from residents, with detailed comments being received from statutory consultees.

### Key Issues

Key issues from respondents include: development would increase flooding on specific sites and also the wider area, the loss of Green Belt land will further increase flooding in the Borough, there is no flood risk assessment or strategy to combat flooding to support the PDO, the potential impact of development on statutory undertakers infrastructure, the lack of information regarding the expansion of infrastructure for sewers and drains to accommodate new development and lastly , how new development has the potential to increase flooding which would impact negatively on the existing population.

### Conclusion

Having considered and taken into account all the representations received during the Regulation 18 consultations, the Council has worked extensively to ensure that the evidence base and the Proposed Submission Version Local Plan Policies, specifically Policy ENV2 Flood Risk and Water Management, are appropriate to respond to and deal with the threat of flood risk across the Borough. It is therefore considered that the Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.

A summary of all issues under this theme and the Council's response to them are set out below in Table 25.

Table 25: Flood Risk – Issues and Responses

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
Concern over increased surface water flooding due to less permeable land being available due to the proposals for approximately 24,000 homes and the necessary infrastructure.	Residents, elected representatives	Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been

		adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.
The fields and areas around the Trans Pennine Trail are already prone to flooding, this will make development difficult.	Residents, elected representatives	<p>All site that has been submitted to the Council for consideration as a potential development site as part of the Local Plan process have been screened for the risk of all sources of flooding through the Council's Level 1 Strategic Flood Risk Assessment (SFRA).</p> <p>The risk of flooding is also one of a number of considerations to be taken in to account through the Council's Local Plan Site Selection Methodology, when considering the suitability of a potential development site be considered for inclusion in the Proposed Submission Version Local Plan.</p>
R18/105 - The fields on the site are prone to flooding especially in rainy periods, so the drainage infrastructure may not be able to cope.	Residents, elected representatives	<p>All site that has been submitted to the Council for consideration as a potential development site as part of the Local Plan process have been screened for the risk of all sources of flooding through the Council's Level 1 Strategic Flood Risk Assessment (SFRA).</p> <p>The risk of flooding is also one of a number of considerations to be taken in to account through the Council's Local Plan Site Selection Methodology, when considering the suitability of a potential development site be considered for inclusion in the Proposed Submission Version Local Plan.</p>
There will be the loss of natural soakaways with the removal of Green Belt.	Residents, elected representatives	Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local

		Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.
The Garden City Suburb will replace large areas of agricultural land with hard surfacing and is bound to change local drainage patterns.	Residents, elected representatives	Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.
The area to be developed around the A50 and Weaste Lane has a high flood risk, which doesn't appear to have been taken into account.	Residents, elected representatives	Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.
The development of industry along the M56/A50 will build on existing farm land which frequently floods.	Residents, elected representatives	Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the



		impacts of flood risk and water management.
There is no flood risk assessment, or consultation with the Environment Agency, nor any indication of whether flood risk has been considered.	Residents, elected representatives	<p>Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.</p> <p>In line with statutory requirements, the Council has also updated its Level 1 and Level 2 Strategic Level Flood Risk Assessments (SFRA) of the Borough, taking in to account the latest flood risk data from the Environment Agency.</p>
The Council should communicate exactly what measures are planned to reduce flooding in Warrington before any development plan is approved.	Residents, elected representatives	<p>Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.</p> <p>In line with statutory requirements, the Council has also updated its Level 1 and Level 2 Strategic Level Flood Risk Assessments (SFRA) of the Borough, taking in to account the latest flood risk data from the Environment Agency.</p>
Development in South Western Urban Extension has constraints in respect of flooding and	Residents, elected representatives	Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment

<p>groundwater.</p>		<p>agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.</p> <p>In line with statutory requirements, the Council has also updated its Level 1 and Level 2 Strategic Level Flood Risk Assessments (SFRA) of the Borough, taking in to account the latest flood risk data from the Environment Agency.</p>
<p>The Western Link is planned to pass over Morley Common which is a flood plain.</p>	<p>Residents</p>	<p>The development proposals for the route of the western Link Road have been part of a separate process, outside that of the statutory Proposed Submission Version Local Plan process.</p>
<p>What will be the impact be on the sewers and drains due to water run-off from roads and areas of hardstanding?</p>	<p>Residents, elected representatives</p>	<p>Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.</p>
<p>Houses and businesses are potentially at risk as flooding will increase with development and global warming.</p>	<p>Residents, elected representatives</p>	<p>Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management</p>

		of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.
Your report lacks an independent assessment of the impact on Warrington's flood risk, especially in already high risk areas, and whether building so much in the South West is likely to have a serious impact on these in the next 50-100 years.	Residents, elected representatives	The Council commissioned the independent planning consultant JBA Consulting to carry out a Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) to support the preparation of the Proposed Submission Version Local Plan and the amount and location of the proposed development.
I couldn't see any reference to flood risk areas (e.g.. flood zone 2, flood zone 3), as classified by the Environmental Agency.	Residents	<p>Through the development of the Local Plan the Council has engaged constructively with United Utilities and the Environment agency to ensure the threat of all types of flooding that could potentially result from the proposed development has been adequately addressed through the preparation on the Local Plan. It is therefore considered that Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.</p> <p>The Council also commissioned JBA Consulting to carry out a Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) to support the preparation of the Proposed Submission Version Local Plan and the proposed development, taking into account the latest Environment Agency flood risk data.</p>
The Environment Agency would like to advise that since the previous consultation on the Local Plan and Sustainability Appraisal, the Environment Agency has produced new Climate Change Guidance which outlines new allowances which need to be considered as part of any Strategic Flood Risk Assessment for Local Plans.	Other stakeholders	<p>These comments are agreed and noted and the Council will continue to work constructively with the Environment Agency as the Local Plan progresses.</p> <p>As part of the evidence base to inform Local Plan policy formulation and site allocations, Officers from the Council have worked with representatives from the Environment Agency to ensure that and that the updated Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA)</p>

<p>The NPPF is clear that any Local Plan has to be based on the most up to date environmental evidence. The SFRA for Warrington was dated 2011 and as a result will need to be reviewed against the latest guidance that has been produced. This should then be used to inform any policies within the local plan, particularly around climate change and site allocations, but also to inform the SA baseline and the key theme for 'Climate Change and resource Use'.</p>		<p>have been produced in line with national planning guidance, taking in to account the latest data from the Environment Agency on flood risk and climate change.</p> <p>The outcome of the discussions with the Environment Agency is reflected in Submission Version Local Plan Policy ENV2 Flood Risk and Water Management of the Proposed Submission Version Local Plan, and it is considered that it sets out a clear policy approach and guidance as to how proposed development should respond to the impacts of flood risk and water management.</p>
<p>In your selection criteria, we would encourage the Council to consider the availability of alternatives to the public sewerage system for surface water discharges. For example, sites with land drains or near to watercourses are a more sustainable alternative to the public sewer. The need to minimise the connection of surface water to the public sewer is a critical matter for United Utilities. It reduces the likelihood of sewer flooding and pollution of the environment.</p> <p>We would prefer development to not take place in close proximity to those groundwater protection zones which have a public water supply purpose. When considering the suitability of each of the sites you assess as part of the Preferred Options consultation, we would urge you to consider proximity to our existing operational infrastructure in particular wastewater treatment works. Our position is that it is more appropriate not to introduce new additional sensitive receptors near to an existing treatment works as part of the preparation</p>	<p>Other stakeholders</p>	<p>These comments are noted and the Council will continue to work and engage constructively with United Utilities as part of the Local Plan process.</p> <p>As part of the Local Plan Duty to Cooperate process, Officers of the Council have liaised with United Utilities representatives whilst developing Local Plan Policies and as part of the Masterplanning process for the wider development areas across the Borough. Specific workshops have taken place with United Utilities with regards to the proposed South West Extension, the South East Garden Suburb and the Warrington Waterfront area.</p> <p>The outputs from these workshops and the various Duty-to-Cooperate meeting have informed the policy development of the Submission Version Local Plan Policies.</p> <p>Policy INF 3 Utilities and Infrastructure of the Submission Version Local Plan also reflects the discussions between the Council and United Utilities and it is considered that this policy sets out a clear policy approach to protecting the operational infrastructure of United Utilities.</p>

<p>of a new development plan. We wish to highlight our treatment works in your area include Warrington North WwTW, Warrington South WwTW and Glazebury WwTW.</p>		
<p>The process should have taken account of Partner Plans (ie. Mersey Forest Plan/Mersey Environment Gateway Trust area of interest (Upper Mersey Estuary)/Environmental Agency's flood map).</p>	<p>Resident</p>	<p>A high level appraisal of flood risk was undertaken as part of the PDO with further detailed studies, for example, a Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA), incorporating the latest flood risk data from the Environment Agency, being undertaken as part of the evidence base to inform the preparation of the Draft Submission Version Local Plan.</p>

## Theme 26: Education and Skills

No of responses Part 1	0
No of responses Part 2	19
<b>Total</b>	<b>19</b>

### Overview

This subject matter received fewer direct responses, however many comments were made in relation to education provision in relation to specific development areas and these are dealt with within separate summary sheets. The majority of responses were from residents, with some from stakeholders with a specific interest in education provision.

### Key Issues

Key issues identified by respondents were that some schools do not have capacity to expand, investment should be sought for existing schools and not just for building new ones, and that the timing of delivery will be crucial. There were also specific concerns raised regarding provision in Lymm and also that school standards may decline with added pressure from population growth.

### Conclusion

The Council is confident that educational needs throughout the plan period will be addressed. Working with internal and external partners the amount of new school places that will be required have been calculated and contributions will be sought from developers to ensure the timely delivery of such requirements. Reference to specific requirements in the main development areas have been made throughout the Plan as well as more general requirements for development within the existing urban area and in the settlements.

A summary of all issues under this theme and the Council's response to them are set out below in Table 26.

Table 26: Education and Skills –Issues and Responses

Issue	Respondent Type	Council Response
When new schools are developed Local Authorities should seek to safeguard land for future expansion where demand indicates that this may be necessary.	Other stakeholders	Noted, this has been considered when identifying likely land take for new schools within the main development areas.
WBC should have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools	Other stakeholders	Noted – this has been considered.

Development' (2011).		
Schools in Lymm are at capacity and have limited space to expand.	Residents	New development in Lymm is required to contribute to the expansion of one of the existing primary schools. The Council's education officers have confirmed that expansion of at least one school in Lymm is possible.
Concerns regarding inadequate school facilities across the Borough with the growth plans proposed.	Residents	The Proposed Submission Version Local Plan has taken into account existing capacity of existing schools at both primary and secondary levels. Gaps, and in some places capacity, have been identified and new development will continue to contribute to new school provision or expanding existing facilities where possible and appropriate. The main development areas require new schools and this is clearly set out in the various site allocations policies.
Concern increased pressures on school facilities will result in decline of standards and health & safety.	Residents	The Council is confident that the increase demand for school facilities will be adequately addressed and there will be no impact on quality of teaching or health and safety standards.
The timing of the delivery of proposed schools will be essential.	Residents	Timing of delivery of key infrastructure will be a key consideration when working up the detail to bring forward the major development sites. Policy MD2 (Garden Suburb), for instance, has been worded such that specific infrastructure requirements and the delivery of such requirements must be identified as each sub area of the Garden Suburb is masterplanned. The Council is confident that policies within the Proposed Submission Version Local Plan will ensure delivery in a timely manner.
There needs to be investment into the existing schools.	Residents	In existing settlements and the main urban area, contributions will continue to be sought to ensure that adequate facilities are in place to support new development. The Council has a good understanding of areas which are in need of improvement, investment or expansion and contributions can be sought in line with the provisions of draft Policy INF4 Community Facilities.
Little consideration for number of births which will impact on	Residents	Data including number of births has been fully analysed in order to assess the

education.		implications of the proposed level of development within the Borough.
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## Theme 27: Neighbourhood Plans

No of responses Part 1	0
No of responses Part 2	5
<b>Total</b>	<b>5</b>

### Overview

There were a smaller number of responses on this theme. The main respondents were residents and councillors.

### Key Issues

Respondents raised concerns that some neighbourhood plans (made or emerging) were not acknowledged in the PDO. There were also concerns that any proposed or draft neighbourhood plans would have little value or leverage to influence their local area. Respondents also highlighted how the PDO would potentially have a negative impact on communities when they had worked hard to develop neighbourhood plans to have more of a say on the development of their local area.

### Conclusion

Since the PDO consultation, the Council has continued to co-operate with and assist neighbourhood planning groups wherever possible whilst having regard to the need for the Local Plan to be the overarching planning document, to which neighbourhood plans must conform.

The Appleton Thorn Neighbourhood Plan has been considered and referred to in the draft Policy MD2 Garden Suburb, as have other neighbourhood plans or areas where relevant.

A summary of all issues under this theme and the Council's response to them are set out below in Table 27.

Table 27: Neighbourhood Plans – Issues and Responses

Issue	Respondent Type	Council Response
Very little reference to the Appleton Thorn Neighbourhood Plan.	Elected representatives	This has now been fully considered and reference is made to the Appleton Thorn Neighbourhood Plan within Policy MD2 Garden Suburb.
Development in the south contradicts guidance written by communities within neighbourhood plans.	Residents	The Council has fully considered Neighbourhood Plans in the preparation of the Proposed Submission Version Local Plan. However this must be weighed with requirements of central government policy for Warrington as a whole to meet its overall development needs.

<p>Stretton Parish Council has applied to WBC for approval to initiate a Neighbourhood Development Plan, seeking co-operation with WBC.</p>	<p>Residents, elected representatives</p>	<p>The Council is committed to co-operating with all Neighbourhood Plan groups. This has now been considered.</p>
<p>The new Neighbourhood Development Plan for Appleton Ward has not been taken into consideration.</p>	<p>Residents</p>	<p>The Council is committed to co-operating with all Neighbourhood Plan groups. This has now been considered.</p>
<p>Consideration of existing neighbourhood plans should be given within the PDO.</p>	<p>Residents</p>	<p>The Council is committed to co-operating with all Neighbourhood Plan groups. This has now been considered.</p> <p>The Proposed Submission Version Local Plan provides strategic planning policies. Policy DC1 encourages the preparation of Neighbourhood Plans to provide more detailed local policies to guide development in specific areas.</p>
<p>Can neighbourhood plans be developed during or after the local plan period and what leverage will they have to guide development in a way that communities aspire.</p>	<p>Residents</p>	<p>Neighbourhood plans must conform with the strategic requirements of an adopted Local Plan.</p> <p>The Council has ensured that the Local Plan focusses on strategic issues and strategic policies. This means there is significant scope for the preparation of Neighbourhood Plans to provide more detailed local policies to guide development in specific areas.</p>

## **Theme 28: Sustainability Appraisal / Strategic Environmental Assessment**

No of responses Part 1	20
No of responses Part 2	226
<b>Total</b>	<b>246</b>

### **Overview**

There was a fairly low level of response in respect of the SA/SEA issue. Responses were from a mix of residents, Councillors, Parish Council's, agents and stakeholders. Responses were overwhelming made at the second stage of the regulation 18 consultation.

### **Key Issues**

There were numerous comments made in this category in respect of general and site specific ecology and wildlife issues that have been addresses in other sections of this report.

The most frequently referred to issue specifically regarding the SA/SEA was that respondents did not feel that an environmental or ecological survey had been evidenced as part of the PDO.

With regards to strategy, several respondents felt that additional reasonable alternatives needed to be tested. This included a greater focus on the north of the Borough, greater dispersal to the outlying settlements, and greater dispersal at the urban fringes.

Other Key issues highlighted by respondents were: the lack of impartiality of AECOM carrying out the SA/ SEA Report; the limited assessment of development on farming; and a lack of an integrated approach in the development of the SA/SEA to examine how the PDO can be sensitive in terms of sustainable development, conservation, archaeology and urban design.

### **Conclusion**

The Council consider that the level of detail within the SA is sufficient and represents a proportionate approach to appraisal. AECOM concur with this view.

We are confident that AECOM have taken an impartial and objective approach to the SA process, and this is evidenced by the robust appraisal findings. AECOM have been particularly keen to ensure that we take a comprehensive approach to the consideration of reasonable alternatives throughout the Plan-making process.

Following the Regulation 18 consultation, the Council worked with AECOM to refine the strategic options to ensure that such elements were considered. This is fairly typical of Plan making, and reflects the iterative nature of the Sustainability Appraisal process. The correct procedures have been followed to ensure that a legally sound Sustainability Appraisal has been undertaken.

Several rounds of Consultation have been undertaken with regards to the SA, including Scoping and options assessment. These are voluntary stages, but have helped us to ensure that early and effective consultation has been undertaken and that the SA is a critical piece of the evidence in helping to shape the spatial strategy and other elements of the Plan.

**Table 1**

Issue	Respondent Type	Council Response
Support for the Sustainability Appraisal Scoping Report and the four stage process it advocates.	Agents	Support noted.
There has been no environmental survey evidenced as part of the PDO to assess development.	Residents	The Council used a proportionate technical evidence base to support the options assessment process.
There has been no ecological survey evidenced as part of the PDO to assess development.	Residents	The evidence base has been updated, expanded and refined to support the preparation of the draft Local Plan, taking into account the response to the PDO consultation. This includes an updated SA Report and a Habitats Regulation Assessment. Detailed ecological surveys (for example a Phase 1 habitat survey) are not a requirement of the SA process. Whilst it is acknowledged that such information is helpful, a proportionate approach needs to be taken. It is considered that sufficient levels of detail concerning ecology have been utilised to guide the assessment processes.
The SA Report uses information which in some cases is the best part of a decade out of date.	Resident	The Interim SA Report includes the most up to date information that is readily available. In some instances, information is not current (for example agricultural land classifications for all of the borough's agricultural land) but it is considered disproportionate to undertake detailed studies to gather such information. Wherever possible, the SA process has utilised additional evidence from the analysis of maps and site visits to supplement and verify information that is 'out of date'.
SA Scoping Report (Para 3.10.7) - does not accurately reflect the NPPF paragraphs 114 and 117 as it lacks a strategic	Other Stakeholders	Appendix B of the Scoping Report sets out a detailed response to this matter. This Appendix is also included within the full SA Report, with additional comments

<p>spatial strategy for networks of biodiversity. The wording for Biodiversity and Geodiversity (Appendix A) needs changing to reflect current guidance and terminology (Replace BAP species with 'Priority species and habitats'). As stipulated in the NPPF paragraph 114 a reference is required in this section to ecological networks/networks of biodiversity. There should be a reference to halting the loss of biodiversity and reaching net gains in biodiversity.</p>		received at Reg18 stage.
<p>SA Scoping Report (SA Objective: Appendix 1) - It is considered that there is a missing Housing criteria to reflect on how an assessed site supports the spatial distribution and meeting local needs.</p>	Agents	
<p>SA Scoping Report (SA Objective: Appendix 1) – The criteria for assessing frequency of bus services does not reflect DfT guidance.</p>	Residents	
<p>SA Objective (Appendix 1 of SA Scoping Report) – The climate change objective and indicator could include a reduction in greenhouse gas emissions and an improvement in air quality. Warrington has data available to inform this objective from the LEP low carbon work around reduction of greenhouse gases.</p>	Other Stakeholder	
<p>SA Scoping Report - The Council should ensure</p>	Agents	Since the consultation on the Scope & Contents of the revised

<p>that the results of the SA process clearly justify its policy choices. The SA/SEA should begin with an objective assessment of the potential options for growth (or not) in Warrington (the alternatives) and it is unclear whether this has been undertaken (robustly) at this stage.</p>		<p>Local Plan, the Council has produced an Interim SA Report that assessed the spatial strategy options.</p> <p>Since the PDO consultation an updated SA Report has been produced, to accompany the Proposed Submission Version Local Plan, which takes account of the additional spatial development options looking at the potential of sites in north Warrington; options with lower levels of development in south Warrington and a greater proportion of development being located in the settlements.</p>
<p>There are a number of groundwater SPZ's within Warrington. The prevention of pollution to drinking water supplies is critical. The aim should be to avoid siting potentially damaging activities in the most sensitive locations from a groundwater protection viewpoint.</p>	<p>Other Stakeholders</p>	<p>The presence of groundwater SPZ's has been taken into consideration in the assessment of the Proposed Submission Version Local Plan.</p>
<p>There has been a lack of consultation on the SA/SEA.</p>	<p>Residents</p>	<p>The Council undertook the PDO consultation as a second stage of Regulation 18 consultation to ensure the public had a genuine say on options for the Plan before the draft Local Plan was prepared in detail. Further consultation will be undertaken on a full SA Report at the Regulation 19 stage of plan-making.</p>
<p>The Interim SA Report (July 2017) does not comply with the SEA and SA regulations, it will also be superseded in due course if directed towards the appraisal of the revised housing and economic growth targets for WBC.</p>	<p>Residents</p>	<p>Since the PDO consultation an updated SA Report has been produced, to accompany the Proposed Submission Version Local Plan, which takes account of the additional spatial development options identified and looks at the potential of sites in north Warrington; options with lower levels of development in south Warrington and a greater proportion of development being</p>

		located in the settlements. In addition, it re-evaluates the level of housing and economic growth. Interim SA Reports are voluntary, and as they represent a point in time in the plan-making process, will not necessarily include all the information that is required in the final SA Report.
Concern over adequacy of SA/SEA and the assessment on farming in the PDO.	Other Stakeholders and Elected Representatives	The SA Framework includes consideration of effects upon soil and land resources. There are specific sections that analyse impacts upon agricultural land.
Complete lack of impartiality of sustainability assessment by AECOM.	Residents	The Sustainability Assessment work undertaken by AECOM, on behalf of the Council, provides an objective independent assessment in line with the SEA Regulations.
Historic England strongly advises that there is engagement with conservation, archaeology and urban design colleagues in the preparation of the SEA for any Local Plan. There does not appear to be much evidence of this.	Other Stakeholders	AECOM sought comments from the Council, including specialist Officers, on draft assessment findings.
Interim SA Report – the SA of the proposed SWUE extension is inadequate. Major inconsistency with how it assesses urban extensions to the north e.g. Winwick - where SA expresses concern of merging with main urban area - and Walton where this has not been identified as an impact. The SA is inaccurate on a number of measures including: ACC5 as Stockton Heath and Stretton Medical centres have no capacity for new residents; BNH1 as this does not consider non-designated heritage	Elected Representatives	The Council has updated its evidence in reviewing the PDO. The SA Framework was developed in consultation with internal and external statutory consultees.

<p>assets; and BHN2 as the assessment ignores the impact on the setting of Walton CA and does not consider the historic landscape and hedges.</p>		
<p>The specific impacts of the Port Warrington proposals have not been adequately assessed.</p>	<p>Residents</p>	<p>The Interim SA Report appraises the effects of the three broad employment areas identified as strategic options for the delivery of employment land requirements. The results of these assessments are contained in Appendix D of the Report. Additional appraisal has been undertaken for each employment site individually (including Port Warrington), and the appraisal of Policy DEV4 makes considerable reference to the effects of Port Warrington.</p>
<p>The impacts of all five strategic options on the environment are understated.</p> <p>All reasonable alternatives have not been assessed (including housing in the North which has better access to existing employment areas, reduces the need to travel and would limit congestion).</p>	<p>Elected Representatives</p>	<p>Since the PDO consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan. The Council has considered additional spatial development options looking at the potential of sites in north Warrington; options with lower levels of development in south Warrington, and a greater proportion of development being located in the outer settlements.</p>
<p>There is a need to consider options that involve a lower amount of growth.</p>	<p>Agents, Elected Representatives</p>	<p>With regards to the levels of growth, it is critical to use objectively assessed projections of housing needs as a starting point. Planning for a lower housing target than this is considered unreasonable as the Council does not believe there are overriding constraints to growth. Furthermore, a wide range of growth options are considered, including targets lower and higher</p>
<p>There is a need to consider options that involve a lower proportion of growth at the Garden Suburb.</p>	<p>Agents, Elected Representatives</p>	



<p>Options should include the consideration of high levels of growth at the outer settlements and also a more dispersed approach at the urban fringes</p>	<p>Agents</p>	<p>than the approach proposed in the Plan.</p> <p>These refined options have all been assessed on a consistent basis, with the findings set out in the updated SA Report. Outline reasons for the selection or rejection of options are provided.</p>
<p>The SA should test the extent to which the Plan (and reasonable alternatives) can achieve 'net gain' in biodiversity.</p> <p>A series of monitoring measures are also suggested.</p>	<p>Other Stakeholders</p>	<p>The SA Framework include a specific sub-question that asks 'Will there be a net gain in biodiversity?' The subsequent assessments have sought to establish the extent to which the Plan (and reasonable alternatives) will deliver this aim.</p> <p>Monitoring measures have been identified in the updated SA Report, and consideration has been given to those measures suggested by Natural England.</p>
<p>Several respondents expressed that they do not fully understand the options, how they were established, or why the preferred approach has been chosen</p>	<p>Residents</p>	<p>The SA Report will set out clearly how options have been established, appraised and selected.</p> <p>The Non-Technical Summary for the SA Report needs to be brought to the attention of consultees at the next stage.</p>

## Theme 29: Views from residents on specific sites submitted under the 'Call for Sites'

No of responses Part 1	0
No of responses Part 2	201
<b>Total</b>	<b>201</b>

### **Overview**

There was a moderate level of response in relation to views about specific sites which had been submitted under the 'call for sites'. The majority of responses came from individual residents, as well as from agents or councillors on behalf of groups of residents. All responses were made at the Regulation 18 (Part 2) consultation stage.

### **Key Issues**

Responses generally objected to the potential allocation of sites both around the main urban area of Warrington and the outlying settlements. Most responses received were in respect of sites to the south west of the main urban area and the settlements of Lymm, Culcheth and Croft.

There is some support for the release of small sites (ie.10/15 units) and PDL sites from the Green Belt, where they are in close proximity to the outlying settlements.

There are several sites that are being promoted where the promoter does not appear to have control of all of the land and/or the consent of landowners.

In addition, there were a number of responses regarding the Peel Hall Site in the north of Warrington. The Council's response to this site is provided under Theme 32: Wider Urban Area development proposals.

Responses generally outlined views on the unsuitability of specific sites that have been put forward for consideration to be released from the Green Belt. There were numerous issues raised some of which are site specific, such as the proximity of a listed building, conservation area or a Local Wildlife Site. However, there are a number of key issues that are common to the majority of sites, which are:

- Increase in traffic congestion and the inability of the local road network to cope with any increases.
- Adverse impacts on local services (ie. GP's/dentists/schools) that are already over-subscribed.
- Adverse impacts on the character of settlements
- Loss of important wildlife habitat.
- Loss of informal recreation resource for walkers, cyclists, horse riders etc.
- Loss of open countryside.

### **Conclusion**

Since the PDO consultation, the evidence base has been updated, expanded and refined to support the preparation of the draft Local Plan, taking into account the responses to the PDO consultation.

The Council has made a number of changes to the spatial options assessment process in response to representations made to the PDO Consultation and considered additional spatial development options looking at the potential of sites in north Warrington and options with lower levels of development in south Warrington. The conclusions of the options assessment process still support the allocation of the Garden Suburb and South West urban extension with incremental growth in the outlying settlements.

A large number of sites in proximity of the outlying settlements were submitted as part of the Local Plan 'call for sites' and during the PDO consultation. The submitted sites had many times the capacity of the number of homes required to support the Plan's spatial development strategy of 'incremental growth' in the outlying settlements. The Council therefore adopted a site selection methodology to confirm the sites proposed to be allocated in the draft Local Plan.

The spatial options and individual site assessment process are outlined in the Development Options and Site Assessment Technical Report.

A summary of all issues under this theme and the Council's response to them are set out below in Table 29.

Table 29: Views from residents on specific sites submitted under the 'Call for Sites' – Issues and Responses

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
Peel Hall – Object to development of site. Various reasons cited, including; Negative impact on local traffic infrastructure; Loss of local sport and leisure land in Cinnamon Brow; Impact on local primary education provision; Loss of yet more greenfield land in an area that has brownfield opportunities; Surrounding land use issues; Site access issues; contamination issues.	Residents	Response provided under Theme 32: Wider Urban Area development proposals.
Site Refs: R18/003, R18/012, R18/100, R18/102, R18/105, R18/108 - Object to allocation of these sites at Red Lane/Higher Walton for various reasons: , development would destroy a natural beauty spot and wildlife	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. These sites have not been taken forward for allocation.

<p>habitat; traffic congestion around Red Lane and Stockton Heath; the canal bridge on Red Lane is single file traffic only; impact on Ancient bridleways; loss of recreation resource; impact on local infrastructure, which currently is very limited; no mains drainage; historical flooding; and contamination.</p>		
<p>Object to allocation of Parcel 1 of GB Assessment as it may affect property values.</p>	<p>Resident</p>	<p>Property values is not a consideration of the Local Plan.</p>
<p>Site Ref: R18/076 - Object to allocation of site. The site is in the Green Belt and currently in use for agricultural purposes; development will result in expansion into the countryside; impact on listed building (Water Tower); school, GPs and road networks in Lymm are already at capacity and roads are also in poor condition; Crouchley Lane is narrow and dangerous; there are limited services with no bank or post office and a limited bus service; further development will adversely impact on the character of Lymm.</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken forward for allocation.</p>
<p>SHLAA Site Ref: 2179 - There is a need to preserve the site at Hardy Road, which has a covenant on it to retain it in education use.</p>	<p>Resident</p>	<p>The site is considered to be surplus and available for development.</p>
<p>Site Refs: R18/014, R18/016, R18/082, R18/117, R18/118, R18/119 - Object to allocation of sites. It</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process.</p>

<p>would significantly add to current traffic issues on Rushgreen Road; traffic on Rushgreen Road has increased in volume and size of vehicles since Sainsbury's was built; the current speed limit of 30mph is too high and should be reduced to 20 mph.</p>		<p>Site Refs: R18/014, R18/016, R18/082 and R18/119 have not been taken forward for allocation. However, Site Refs: R18/117 and R18/118 (in association with R18/018) are considered suitable for allocation. The site allocation process included an assessment of the traffic impacts.</p>
<p>Site Refs: R18/115, R18/127 and SHLAA Site 15231 - Object to allocation of sites. It will destroy the character and identity of Croft; impact on local services; destroy wildlife and increased traffic.</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. These sites have not been taken forward for allocation.</p>
<p>Site Refs: R18/054, R18/060 and R18/083 - Object to allocation of sites. It will destroy the character and identity of Burtonwood; impact on local services; impact on wildlife; increased traffic/congestion; local transport system could not support further development; Lumber Lane is already used as a cut through from St Helens and Newton-Le-Willows, Earlestown, Haydock etc. Omega has drawn a lot of workforce from these areas and caused massive through flow along the narrow country lanes around Burtonwood; and adverse impact on property prices.</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. Site Refs: R18/054 and R18/060 have not been taken forward for allocation. However, part of Site Ref: R18/083 is considered suitable for allocation. The site allocation process included an assessment of a range of issues, including, the traffic impacts and the impacts on wildlife and the character of the settlement and the area generally.</p>
<p>Site Ref: R18/018 - Object to allocation of site. It will create misery to residents of Thirlmere, Mardale and Grasmere, for the duration of</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. The site (in association with</p>

<p>construction.</p>		<p>R18/117 and R18/118) is considered suitable for allocation. The possibility of disruption during the construction process is not a justification for withholding allocation of the site. Disturbance from construction can be controlled by other legislation and conditions on any planning consent, as is appropriate.</p>
<p>Site Ref: R18/088 - Object to allocation of site. This is an entirely inappropriate development on existing Green Belt land; it will destroy the view and nature of the countryside in Stretton Village.</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. The site is considered suitable for allocation as part of the Garden Suburb. Since the PDO consultation, a revised concept masterplan for the Garden Suburb has been prepared. It has been designed to respect existing settlements and villages both within the boundary and beyond it within the existing urban area. Through sensitive design and landscaping the existing villages can be protected. Specific details will be required in more detailed masterplanning exercises for different parts of the Garden Suburb. This will be required as part of Policy MD2 of the Proposed Submission Version Local Plan.</p>
<p>Site Ref: R18/107 - Object to allocation of site. Impact on character of area; it contains Heatley Flash which is a wildlife area that supports local and migratory birds and also a pond used by fishermen; unstable land due to subsidence from Salt mining; traffic congestion and flooding.</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken forward for allocation.</p>
<p>Site Ref: R18/112 - Object to allocation of site. It makes a STRONG contribution to the Green</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and</p>

<p>Belt; traffic congestion on the A50 and Weaste Lane; no independent environmental impact studies been carried out.</p>		<p>individual site assessment process. This site has not been taken forward for allocation.</p>
<p>Policy should seek to promote diversification opportunities that support productive farms and farmers should be able to choose to put forward land for housing where this makes economic sense and supports wider farming businesses.</p>	<p>Other stakeholder</p>	<p>The draft Local Plan support rural businesses. Land owners have had the opportunity to promote land through the Local Plan.</p>
<p>Site Ref: R18/070 - Object to allocation of site. Loss of prime agricultural land; impact of well used public footpath; increased traffic congestion; and loss of buffer to proposed HS2 route.</p>	<p>Resident</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken forward for allocation.</p>
<p>Site Ref: R18/106 – Object to the allocation of the site. The site is not available as 6 residents own freehold properties on this land and have not been consulted on its availability; the site is extremely bio-diverse; hosts a productive dairy farm and is subject to flooding.</p>	<p>Resident</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. The site is considered suitable for allocation as part of the Garden Suburb. Since the PDO consultation, a revised concept masterplan for the Garden Suburb has been prepared. It has been designed to respect existing development. Through sensitive design and landscaping existing development can be protected. Specific details will be required in more detailed masterplanning exercises for different parts of the Garden Suburb. This will be required as part of Policy MD2 of the Proposed Submission Version Local Plan.</p>
<p>Site Refs: R18/121, R18/125, R18/133 and R18/167 - Object to</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report</p>

<p>allocation of sites. Loss of an oasis close to the town centre; Loss of and impact on Moore Nature Reserve; loss of ancient wet woodland; loss of wildlife habitat (sites support a number of declining species and many rare breeding birds - it is an important stopping point for migratory birds up the Mersey valley and wintering wildfowl); Loss of recreation resource.</p>		<p>outlines the spatial options and individual site assessment process. These sites are considered suitable for allocation, either as part of the SWUE or as part of Warrington Waterfront. The site allocation process included an assessment of a range of issues, including, the impacts on wildlife/ecology. It is acknowledged that the allocation of Port Warrington will result in the loss of a significant portion of the existing Local Wildlife Site. Policy MD1 of the Proposed Submission Version Local Plan requires the agreement of mitigation for the loss of part of Moore Nature Reserve before any expansion of Port Warrington is permitted. The mitigation package is required to ensure a net gain in biodiversity with new and improved habitat for local wildlife to be created within and in close proximity to the Waterfront area, including at the new Country Park. Whilst, Policy MD3 requires the development of a Green Infrastructure Strategy that demonstrate how development within the urban extension will protect and enhance existing wildlife corridors and provide new corridors to link the site into Warrington's wider ecological network, with particular consideration being given to protecting and enhancing habitat for migrating birds, given the site's proximity to the Mersey Estuary Special Protection Area. These Policies have been developed in consultation with Natural England.</p>
<p>There is no consideration of the amenities and conservation areas that would be lost and the villages of South Warrington that would merge into one.</p>	<p>Residents</p>	<p>Since the PDO consultation, a Heritage Impact Assessment (HIA) has been undertaken of the Garden Suburb area and the immediate surroundings. Historic England has been consulted on the contents of the assessment.</p>



		The concept masterplan for the Garden Suburb has been designed to respect existing settlements and villages both within the boundary and beyond it within the existing urban area. Through sensitive design and landscaping the existing villages can be protected. Specific details will be required in more detailed masterplanning exercises for different parts of the Garden Suburb. The findings of the HIA have informed the masterplan and Policy MD2 of the Proposed Submission Version Local Plan.
Site Ref: R18/117 - Support of allocation of site. The site is PDL.	Resident	Support noted.
Site Ref: R18/079 - Object to allocation of the site. The proposed exit onto Warrington Road, opposite a school with on road parking, raises safety concerns; the site is divided by a high-pressure gas pipeline.	Elected representatives	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken forward for allocation.
Site Refs: R18/007 and R18/064 - Object to these sites being allocated. The allocation of these sites would totally destroy the historic value of the village; increase pollution; increased traffic congestion; the allocation of R18/007 impact on the possible designation of the Battle of Winwick (1648) as a Historic Battlefield.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. These sites have not been taken forward for allocation.
Site Refs: R18/040 - Object to this site being allocated. The allocation of this site would totally destroy the historic value of the village; increase pollution; increased traffic congestion.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. However, the site is considered suitable for allocation. The site allocation process included an assessment of a range of issues,

		including, traffic, heritage and air quality impacts.
Site Refs: R18/119, R18/120 and R18/132 – Object to the allocation of these sites. Loss of remaining green areas between Lymm and Oughtrington will destroy the two communities.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. These sites have not been taken forward for allocation.
Site Refs: R18/119, R18/120 and R18/132 – Object to the allocation of these sites. Loss of remaining green areas between Lymm and Oughtrington will destroy the two communities.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. Site Refs: R18/119 and R18/120 have not been taken forward for allocation. However, part of site Ref: R18/132 is considered suitable for allocation. The site allocation process included an assessment of the impacts on a range of issues, including green infrastructure and the character of the area.
Site Ref: R18/060 - Object to the allocation of the site. The site provides a buffer between Burtonwood village, Omega North and the motorway, and preserves the village identity.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken forward for allocation.
Site Ref: R18/095 – Object to the allocation of site (Heathcroft Stud Fm): impact of traffic in Cul-de-sacs of Deacons Close and Abbey Close which have significant on-street parking; the addition of 90 homes, will treble the amount of traffic that uses the existing cul-de-sac.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. However, the site is considered suitable for allocation. The site allocation process included an assessment of the traffic impacts.
Site Ref: R18/129 – Object to the allocation of site. The land forms part of Croft’s heritage of farming, agriculture and horse riding.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken

		forward for allocation.
Site Refs: R18/044, R18/057 and R18/067 - Object to the allocation of these sites. Areas at risk of flooding (The water table in Ditchfield Lane is already very close to the surface); Strongly performing GB; loss of footpaths for walkers/cyclists, and increased congestion.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. These sites have not been taken forward for allocation.
Site Ref: R18/081 - Object to the allocation of the site. Land within the site is not available as it is in different ownership and the owners have not been consulted on its availability; the site has ecological/wildlife value.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken forward for allocation.
Site Ref: R18/111 - Object to the allocation of the site. Full implications of the Essar pipeline have barely been considered; The Landscape and visual appraisal identifies the high negative impact for the residents along south side of A56 but provides no mitigation against this impact. Development would block the wide open view to the NNE, which stretches over 30 km to Scout Moor behind Burnley; and significant reduction in value of properties along Higher Lane due to increased traffic and loss of view.	Residents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken forward for allocation.
Site Refs: R18/53, R18/055 and R18/056 - Support for the allocation of these sites. They are ideal sites to fulfil the proposed housing numbers for Hollins Grn.	Developers/agents	Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. Site Refs: R18/053 and R18/055 have not been taken forward for

<p>Approximately 50% of Site R18/053 is PDL; the adjoining sites 055 and 056 provide logical, sound infill sites that can be developed completely independently, without the risk of further adjoining development encroaching on the Green Belt.</p>		<p>allocation. However, Site Ref: R18/056 (in association with R18/P2/151) is considered suitable for allocation.</p>
<p>Site Refs: R18/041, R18/089, R18/090 and R18/128 - R18/128 would join Culcheth northwards up to the Chat Moss Railway Line. R18/089 and R18/090 would join the Chat Moss railway line up to the A580. These two sites would easily double the size of Culcheth and link the village to Lowton, Leigh and beyond. This is not sustainable development and goes against the purposes of the Green Belt. The HS2 route makes site R18/041 between the village and the linear park important in retaining the openness of the Green Belt. In practical terms the access is from a roundabout on Wigshaw Lane which already has traffic problems.</p>	<p>Residents</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. These sites have not been taken forward for allocation</p>

### Theme 30: Warrington Town Centre development proposals

No of responses Part 1	3
No of responses Part 2	701
<b>Total</b>	<b>704</b>

#### **Overview**

There was relatively high level of response in respect of the PDO proposals for the Town Centre. Responses were predominantly from residents with further responses from Councillors, Parish Council's, agents and stakeholders. Responses were overwhelming made at the second stage of the regulation 18 consultation.

#### **Key Issues**

Respondents were generally supportive of the regeneration of the town centre, however they wanted the PDO to focus on specific areas of development: such as driving a higher density of residential development than currently proposed, the need to improve traffic infrastructure by reducing congestion and improving existing links, the desire for high quality development respective of the local urban area and the need to support the development of cultural amenities in the centre.

Other issues identified in the PDO were the need to revitalise certain areas of the town including Bridge Street; the benefit and need to make the historical buildings more of a feature within the town centre; the need to regenerate brownfield land to make the centre more attractive; the need for the Local Plan to help make Warrington more competitive (e.g. free parking as an option to encourage visitors) and the importance of giving Warrington its own identity and attractions in a competitive landscape (in regards to other neighbouring cities/towns and out of town retail centres).

#### **Conclusion**

The Council has updated the town centre masterplan, taking into account representations made to the PDO Consultation. It ensured the key principles of promoting the town centre as a key focus for retail, employment, culture and leisure, together with the aim of promoting high density residential development, are embedded in the Proposed Submission Version Local Plan.

A summary of all issues under this theme and the Council's response to them are set out below in Table 30.

Table 30: Warrington Town Centre development proposals – Issues and Responses

Issue	Respondent Type	Council Response
Bridge Street and Golden Square are struggling and need development.	Residents	The Bridge Street Quarter Regeneration scheme is under construction and due to be completed in early 2020.
The redevelopment of the market is just a white elephant.	Residents	The re-development of the Market is an integral part of the Bridge Street Quarter regeneration scheme. The market recently won an

		award for "best small indoor market" at the Great British Market Awards, despite currently being in a temporary home.
Parking charges keep everyone away.		Comment noted, but this is outside the scope of the Local Plan.
More needs to be done to improve transport in the town centre, particularly reducing traffic going through the centre. There is gridlock regularly, particularly when the motorways are disrupted and traffic spills off onto the surrounding roads, which is at least 3 times a week.	Residents	A key aim of the Local Plan is to support the infrastructure required to address existing congestion and improve access to the town centre from the wider Warrington area. The committed Centre Park Link and proposed Western Link will make significant contributions to this aim.
An overall improvement of public transport infrastructure in the town centre is required (eg. improve bus services into and out of the centre, potential for park and ride system, Oyster card style payment system).	Residents	The Council is preparing its Local Transport Plan at the same time as the Local Plan to ensure new development contributes to promoting sustainable transport modes and reduces reliance on the car.
Support for the regeneration of the town centre and maximising its development potential.	Residents, elected representatives, developers/agents, other stakeholders	Support noted.
Better leisure/sport facilities/cycleways need investment to encourage people to take more exercise.	Resident	The Proposed Submission Version Local Plan seeks to deliver major new parks, new green links and increased access to river and waterside frontages will improve leisure opportunities and increase the borough's biodiversity. New development will be integrated into a transformed public transport system. The enhanced Green Space and Waterways network will provide high quality walking and cycling routes that promote active lifestyles, reduce carbon emissions and contribute to improving air quality.
Will affordable housing be provided in the town centre?	Resident	Policy DEV2 of the Proposed Submission Version Local Plan seeks affordable housing

		provision on town centre sites, subject to viability.
Flats and apartments would regenerate the town centre. More use should be made of the upper floors of buildings for apartments	Residents	Policy TC1 of the Proposed Submission Version Local Plan seeks to optimise the use of each site within the town centre and surrounding areas with an increased focus on residential development. Within the defined Town Centre boundary residential development will be required to be built to a minimum density of 130dph and within the wider City Centre Masterplan area residential development to be required to be built to a minimum density of 50dph.
Achieving a higher housing density in the town centre (such as apartments) of up to 40 dwellings per hectare would have the advantage if requiring less greenbelt land or enabling a different type of housing mix to be built (such as bungalows for elderly residents).	Residents	
Warrington town centre is well connected by train to most of England and Scotland. In particular, there are direct links to Manchester/Liverpool Airports. It should be a desirable place to live and this should be made more of a feature/ selling point.	Resident	Comment noted.
Development in the town centre should focus on the regeneration of brownfield land.	Residents	Development in the town centre is exclusively focused on brownfield land.
Warrington Council should seek to bring the town centre up to date with development taking examples from Liverpool and Manchester.	Residents	The main priority of the Proposed Submission Version Local Plan, supported by Master Planning work, is to continue the regeneration of Inner Warrington, including the town centre.
Boots in Bridge Street and TJ Hughes in Sankey Street have remained vacant for years. It is clear that retail activity has been both shrinking and moving in the direction of Golden Square, leaving empty property elsewhere in the Town Centre. This property should be reused for residential purposes.	Elected representatives	These sites form an integral part of the Council's Master planning work for the Town Centre. Policy TC1 of the Proposed Submission Version Local Plan supports the development of these areas for a mix of uses including residential development.
Housing close to railway stations and the bus	Residents, developers/agents	Policies INF1 and TC1 of the Proposed Submission Version

interchange would reduce dependency on car travel.		Local Plan support development in sustainable locations with good access to public transport facilities generally and high density development in the town centre.
Objection to Master planning. The proposals for the town centre will have an adverse impact on its distinctive character.	Residents	The Proposed Submission Version Local Plan seeks to achieve sustainable development by balance the economic, social and environmental objectives of national planning policy. The town centre Master Planning takes account of the historic environment in the town centre by concentrating development/regeneration opportunities in areas that are less sensitive in terms of heritage assets. Policy DC2 of the Proposed Submission Version Local Plan seeks to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development. Whilst, Policy TC1 seeks to ensures that development in the town centre is of; outstanding design quality; enhances the public realm; and mitigates any impacts on heritage assets, environmental quality and residential amenity.
The quality of the new gargantuan constructions in the town centre have not harmonised with the traditional historic character and scale and fine urban grain.	Residents	
There is some wonderful architecture in Warrington that is not being made the most of.	Residents	
The city centre does not have enough conservation areas. What is considered to bring the historical quality of the building in the town centre?	Residents	
There needs to be a much higher quality of architecture.	Residents	Policy DE6 of the Proposed Submission Version Local Plan requires good design to be at the core of all development proposals. Whilst Policy TC1 requires all development within the Town Centre and the Masterplanning areas to: improve the quality of the environment generally and at encourage the use of taller buildings of outstanding design quality at gateway sites to the Town Centre and along



		identified strategic corridors.
The town centre is a poor attraction and out of town retail parks with free parking make going into town with large parking fees unnecessary and unappealing.	Residents	Policy TC1 seeks to maximise the number of people living in Warrington Town Centre and focus its future as a vibrant hub of retail, culture, leisure and entertainment, sustainable transportation, business and living.
There is a lack of hotels in the town centre.	Residents	
Warrington is not well served culturally. There are no nice restaurants, bars cinemas or theatres.	Residents	
The Local Plan should support arts and culture at all levels to support the local economy and ensure that all residents and visitors have access to cultural opportunities. Policies should protect, support and enhance cultural facilities (Specific reference made to the main library) and activities; and promote cultural led development as a catalyst for regeneration in the town centre.	Residents, other stakeholders	
The town centre ASDA Superstore should be retained in the Local Plan. The retention of the store complements the envisaged mixed uses, promotes the competitiveness of Warrington's town centre and delivers continued choice and amenity for the people of Warrington. The loss of the store fails to promote competitiveness and customer choice within the town centre, compromises its vitality and viability and challenging the objective of Paragraph 23 of the NPPF.	Developers/agents	Since the PDO consultation, the Town Centre Masterplanning has been updated to take account of the response and Parcel C3 has been shown as being retained in commercial use.
The Master plan fails to take appropriate account of the existing established uses, with no reference made to how the existing supermarket would	Developers/agents	Since the PDO consultation, the Town Centre Masterplanning has been updated to take account of the response and Parcels E3 to 38 and E14 to E16

form part of a redeveloped Eastern Gateway. Sainsbury's have no intentions to relocate and have not been party to any consultation exercises to inform the development of the City Centre Master plan.		have been shown as being retained in commercial use.
Support for the aspirations to regenerate Warrington town centre. However, the number of dwellings identified as coming forward in this area is considered to be unrealistic.	Developers/agents	Since the PDO consultation, the Town Centre Masterplanning has been updated to re-confirm the number of dwellings that could be delivered in these areas.
There is no market demand for the number of city centre properties identified and the sites identified will only come forward as part of comprehensive regeneration projects - they are in active use and have other complexities/constraints which would delay delivery.	Residents	The Local Plan and associated Town Centre Masterplanning identifies areas for comprehensive regeneration and seeks to bring these forward.
Support for increasing housing densities in the town centre to support the New City aspirations and reduce need for Green Belt release.	Residents, elected representatives, developers/agents	Support noted.
Support for provision of accommodation of young people and creating spaces for young people to spend their time in the town centre.	Residents	The ongoing regeneration of the Town Centre will provide opportunities for young people to live, work and spend leisure time in the town centre.
Support for the aim to provide additional capacity and congestion relief to allow the City Centre to maximise its development potential.	Other stakeholders	Support noted.
Traffic problems in Warrington are likely to be exacerbated when the new toll bridge opens between Runcorn and Widnes, drivers choose to come through Warrington Town Centre to avoid toll charges. This negatively impacts the town, air quality, health and costs to businesses and individuals. What has been considered regarding this?	Residents	The Council is monitoring the change in traffic flow following the opening of the new Mersey Crossing. The proposed Western Link, together with other policies initiatives set out in the Local Transport Plan will ensure that access to the town centre is improved. The Council is also working to improve air quality in the borough through its Air Quality Strategy, which has informed the Proposed

		Submission Version Local Plan.
The requirement for the interests of businesses to be addressed within Local Plans is also identified by the NPPF as an important stage in the plan-making process which needs to be considered in the town centre redevelopment in the Local Plan.	Other stakeholders	One of the primary objectives (W3) of the Proposed Submission Version Local Plan is to strengthen and expand the role of Warrington Town Centre. Policies DEV5 and TC1 in combination seek to maximise the number of people living in Warrington Town Centre and focus its future as a vibrant hub of culture, leisure and entertainment, sustainable transportation, business and living.
Warrington should be redesigned as a residential centre with fewer shops and more leisure outlets.	Residents	
Out of town retail units have been encouraged on Winwick Quay, using up land that could have been used for housing, and reinforcing dependency on the car. Development could have taken place in the town instead.	Residents	
The Master planning work for the Town centre has not been shared with the Trans Pennine Trail Office, despite the TPT being directly impacted within these proposals. There is no evidence of commitment to sustainable travel or providing fully accessible facilities. The TPT and other sustainable transport routes should be clearly shown on the map.	Other stakeholders	Since the PDO consultation, the Proposed Submission Version Local Plan has been produced in parallel with the LTP4. Objective W4 of the Draft Plan, amongst other things seeks to promote safer and more sustainable travel; and encourage active and healthy lifestyles. Policies INF1 and INF2 seek to increase the use of public transport, cycling and walking, as alternative modes of transport and identify a number of routes/corridors to be protected for transport schemes.
The Bank Quay area needs some updating/improvement.	Residents	Policy TC1 and the Town Centre Masterplanning identify the area around Bank Quay Station for the creation of an enhanced transport hub, supported by a wide variety of uses.

### Theme 31: Waterfront development proposals

No of responses Part 1	1
No of responses Part 2	402
<b>Total</b>	<b>403</b>

#### Overview

There was a relatively large response in respect of Warrington Waterfront. Responses were from residents, Councillors, Parish Council's, agents and stakeholders. Responses were overwhelming made at the second stage of the regulation 18 consultation.

#### Key Issues

Responses were generally supportive of development of the residential led component of the Waterfront area due to the proposed benefits of revitalisation. There were however specific concerns regarding the development. These include: the concerns regarding transport infrastructure to support the development specifically the proposed Western Link's relationship to the area and the need to ensure the development is positive through good design and the development of facilities and amenities to support the areas vibrancy.

Key issues identified regarding the Waterfront were the potential impact of development on traffic with the potential to worsen the situation in the area, the potential of the development to flood due to its location, the need to define a timescale of development within the wider PDO plan, the concern that the development will impact the Moore Nature reserve, the need high density development so less Green Belt may be used, and lastly the need to create a distinctive place that compliments the town centre.

The employment element of the Waterfront, including Port Warrington, is considered separately within this report.

#### Conclusion

Having considered all the representations received the Council has redefined the extent of the Waterfront allocation to focus on land to the west of the West Coast Main Rail Line. In addition, masterplanning work has been updated to reflect comments on the availability and deliverability of sites, particularly in respect of the confirmed route of the Western Link.

A summary of all issues under this theme and the Council's response to them are set out below in Table 31.

Table 31: Waterfront –Issues and Responses

Issue	Respondent Type	Council Response
The North West Ethylene Pipeline is located in close proximity to the proposed Waterfront Area. Has this been considered in the plans?	Developers/agents, other stakeholders	Since the PDO consultation, a detailed assessment of the constraints has been undertaken for the Waterfront area and the immediate surroundings. The findings have informed the revised Masterplan and Policy MD1 of

		the Proposed Submission Version Local Plan.
Policies CS9 and CS10 of the current LPCS should be revised to include specific proposals for the Spectra site on Centre Park. It is considered that the current plan provides insufficient clarity on these designations and this would be better reflected in a more structured series of policies including a specific policy that deals with Spectra Park and the CPLR.	Developers/agents	The Waterfront Allocation has been refined to focus on land to the west of the railway line. The Spectra site has been included as part of the capacity of the existing urban area. The Council is confident that this land can come forward for development without a specific allocation in the Local Plan.
Congestion is already an issue in this area, it is a concern that development will cause further harm.	Residents	The Western link will help ease the town's long standing issues with congestion by linking the A56 Chester Road with the A57 in Great Sankey. This will significantly improve north south movements through the Borough by providing a second high level crossing of the MSC that is not dependant on shipping movements.
The proposal is in a good location and use of brownfield land is considered to be positive.	Residents, elected representatives, developers/agents, other stakeholders	Support noted.
The option to develop the Waterfront is much more in favour than the development of Green Belt. More development should be focused here.	Elected representatives	Support noted.
Warrington Waterfront is unattractive currently. Regeneration of these areas is considered to be positive.	Residents, elected representatives, developers/agents, other stakeholders	Support noted.
The waterfront area is being built on a flood plain, there needs to be adequate flood protection for this and a new road infrastructure with flood protection.	Residents, other stakeholders	In line with statutory requirements, the Council has also updated its Level 1 and Level 2 Strategic Level Flood Risk Assessments (SFRA) of the Borough, taking in to account the latest flood risk data from the Environment Agency.

		No residential development is proposed in Flood Zone 3.
Coupled with development plans being led by a massive global company in AECOM and Waterfront plans led by the notorious Peel Holdings. There is concern that this proposal is firmly out of the hands of the people that should matter most in Warrington.	Resident	The Waterfront is a longstanding development priority of the Council and has been subject to extensive public consultation. Further consultation will be undertaken as the proposals are worked up in more detail.
WBC has suggested waterside development in the town centre but does not go far enough to create a sense of place where young people want to live (like a city).	Residents	Since the PDO consultation, a detailed assessment of the constraints has been undertaken for the Waterfront area and the immediate surroundings. The findings have informed the revised Masterplan and Policy MD1 of the Proposed Submission Version Local Plan. The policy requires specific infrastructure to be provided and the preparation of a masterplan for the entire site allocation together with a delivery strategy and phasing plan in order to ensure comprehensive and coordinated development.
The PDO is short on details for development here. The only figure is the Western Link option, there is not a diagram showing where the Waterfront development would be.	Residents, elected representatives	
Will there be enough social infrastructure in place in this area?	Residents	
The opportunity, timing and the proportion of development that will take place in the Town Centre and on the Waterfront has not been spelled out adequately.	Residents, developers/agents	
Support the principle of development on the Waterfront. However, it is considered that it is over reliant on the delivery of the Western Link. This needs to be monitored and housing targets for this area re-distributed to deliverable sites elsewhere in the Borough as necessary.	Developers/agents	It is acknowledged that the development of the Waterfront is reliant upon the delivery of the Western Link and Policy MD1 of the Proposed Submission Version Local Plan specifically precludes any development until funding has been secured and a programme of construction has been confirmed for the Western Link. A funding bid has been submitted to the DfT and the Council is confident the
The development of the Waterfront remains un-costed and unfunded.	Residents, developers/agents	

<p>Imperative that traffic associated with this development moves northwards and does not exacerbate traffic problems south of the Ship Canal.</p>	<p>Residents, elected representatives</p>	<p>Western Link will be delivered.  Policy DEV1 contains a review mechanism should monitoring indicate that a 5- year deliverable and/or subsequent developable supply of housing land over the Plan Period can no longer be sustained.</p>
<p>There is no evidence that there has been an assessment of the historic landscape in this area.</p>	<p>Other stakeholders</p>	<p>Since the PDO consultation, a Heritage Impact Assessment has been undertaken of the Waterfront area and the immediate surroundings. The findings of the assessment have informed Policy MD1 of the Proposed Submission Version Local Plan. Historic England has been consulted on the contents of the assessment and has raised no major concerns.</p>
<p>There should be more efficient use of land with a higher density of jobs and houses.</p>	<p>Residents</p>	<p>The Waterfront is intended to be a high density development. The proposed policy (MD1) in the Draft Local Plan requires a minimum density of 50 dph.</p>
<p>Allocation for commercial uses on the waterfront are too optimistic, there are currently many vacant retail and office units around the area and Warrington. Mixed use units should be considered to allow flexibility.</p>	<p>Elected representatives</p>	<p>Policy MD1 of the Proposed Submission Version Local Plan requires the provision of a mix of employment uses. These have been informed by the Council's updated Economic Development Need Assessment (2019). There is no retail provision, other than local services proposed in the Waterfront allocation.</p>
<p>The city centre waterfront project looks like the perfect solution. It brings to life a neglected area with a proper mix of housing and facilities. It could help to revitalise Warrington Town Centre. If a good mix of high density affordable housing is included it should be attractive to younger people.</p>	<p>Resident</p>	<p>Comments noted. The Waterfront is a key regeneration priority for the Council, the principle, of which has been established in previous Local Plans. The Council's City Centre masterplan envisages the Waterfront as an extension to Warrington town centre, providing a high density residential development within the existing urban area. Policy MD1 of the Proposed</p>

		Submission Version Local Plan requires residential development to be constructed to an average minimum density of 50dph and for a minimum of 30% of homes to be affordable.
The deliverability of the master plan capacity is questioned due to land ownership issues and presence of active occupiers on a number of sites. We provide our own summary trajectory which recommends deducting 3,327 units from the 7,634 suggested across the City Centre and Waterfront; including 1,646 units from years 1-10, unless significant additional evidence is provided to justify the delivery rates proposed.	Developers/agents	Since the PDO consultation, the SHLAA and Masterplanning work have been reviewed and updated to confirm the existing urban capacity taking account of the various consultation responses. The findings have informed the revised Masterplanning work and housing trajectory referred to in Policy DEV1 (and contained in Appendix 1) of the Proposed Submission Version Local Plan.
Consultation material for the proposed 'Western Link' highway scheme suggests that commencement of construction works (subject to funding award) could be expected in the early 2020s. The proposed new Western Link infrastructure could lead to a level of traffic redistribution around Warrington with some impacts for the SRN and requires further detailed assessment as part of a wider package of potential highway infrastructure improvements.	Other stakeholders	Since the PDO consultation the Council has undertaken detailed transport modelling work on the level and location of development proposed in the emerging Local Plan. The Council is continuing to work with Highways England to ensure the impacts on the Strategic Road Network are understood and to ensure that appropriate mitigation measures are delivered.



### Theme 32: Wider Urban Area development proposals

No of responses Part 1	3
No of responses Part 2	106
<b>Total</b>	<b>109</b>

#### Overview

Respondents comments on development within the ‘Wider Urban Area’ were mixed with responses ranging from support for development in the existing urban area to objecting to development on the grounds that the character of the existing area would be changed. Respondents ranged from residents to stakeholder, councillors and landowners/agents.

#### Key Issues

Key issues raised related to the ability of the existing urban area to accommodate further development. Some respondents advocated that the urban area should be prioritised for development before more peripheral areas and others suggesting the opposite approach – bringing forward more development in peripheral locations subject to them being in close proximity to existing infrastructure. A number of comments highlighted issues with existing infrastructure and services in the urban area and emphasised a need for further investment in this regard. There were also a notable number of objections to proposals at Peel Hall.

#### Conclusion

The Spatial Strategy which underpins the Proposed Submission Version Local Plan is based upon maximising development within the existing urban area as a priority before allowing Green Belt release. The urban area includes the Peel Hall site which has been allocated for residential use within the draft plan, subject to ensuring that the required supporting transport infrastructure can be delivered. A full assessment has been made of existing levels of infrastructure in the urban area with any gaps in provision highlighted and reflected in the Council’s Infrastructure Development Plan. Contributions will be sought from developers to ensure that services and infrastructure are sufficient to meet the needs arising from any development.

The Council has produced a development trajectory which confirms the anticipated delivery rates on individual sites over the plan period. This identifies that most sites within the urban area will come forward within the first 10 years of the plan period.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 32.

Table 32: Wider Urban Area –Issues and Responses

Issue	Respondent Type	Council Response
The Local Plan’s proposed approach to the Wider Urban Area is supported and both Westbrook and Birchwood should retain	Other stakeholder, developers/agents	Noted. Existing district centres are being retained within the Proposed Submission Version Local Plan as set out in Policy DEV5 Retail and Leisure Needs.

<p>their position as District Centres in the Local Plan, with both anchor ASDA stores remaining within those District Centres.</p>		
<p>Object to Peel Hall application proposals.</p>	<p>Residents</p>	<p>Objections noted. Proposals for this site have recently been through the planning application and appeals procedure. Both the Council and the Secretary of State accept the principle of residential development on the site, subject to highways and access issues being resolved. In accordance with the appeal decision issued by the Secretary of State in December 2018, the Council has allocated the site for residential development in the Proposed Submission Version Local Plan (See Policy MD4). In terms of delivery and timescales, the site is not anticipated to come forward within the first 5 years of the plan allowing a realistic time period for the outstanding issues, as highlighted by the SoS, to be resolved.</p>
<p>Key centres should be developed in the wider urban area.</p>	<p>Residents</p>	<p>A full assessment of existing infrastructure and services has been made in order to identify the need for further investment over the plan period. New centres have been identified in the main development areas to meet new demand. New services and facilities have been identified in the existing urban area at the Waterfront (See Policy MD1) and Peel Hall (See Policy MD4). In addition Section 106 contributions.</p>
<p>Concern about lack of infrastructure to support development proposed within the urban area.</p>	<p>Residents, elected representatives</p>	<p>A full assessment of existing infrastructure and services has been made in order to identify the need for further investment over the plan period. Development within the existing urban area will be required to contribute to improving services and infrastructure where this is</p>

		deemed necessary.
Concern about impact of character of existing urban area in South Warrington.	Residents	Noted. The Council appreciates that the proposed areas of Green Belt release will have an impact on the existing urban area in the south. However, the growth areas have been through masterplanning exercises and will continue to be planned in detail in order to integrate them with the existing urban area and ensure that impacts are minimised wherever possible. There will be further opportunity to comment on formal planning documents which will provide greater detail on design and areas of separation, particularly for the Garden Suburb.
Land in the existing urban area should be prioritised for development and housing density should be maximised given that infrastructure already exists to serve such development.	Developers/agents, other stakeholders	The Spatial Strategy which underpins the Proposed Submission Version Local Plan does exactly that. It is recognised that development in the existing urban area should be maximised before the release of Green Belt land. However, even when this approach is taken there is still a latent demand for land to be taken out of the Green Belt in order to meet the Borough's development needs over the plan period. Capacity within the existing urban area has been analysed in detail and the development trajectory demonstrates that Green Belt land will be developed later in the plan period.
Too much development is proposed to be directed towards the existing urban area. A greater proportion should be directed towards peripheral/greenfield locations, especially those well located/accessible and served by infrastructure.	Developers/agents	In accordance with national planning policy and the principle of sustainable development, the Council has a duty to maximise the capacity of the existing urban area first before directing development to more peripheral locations. That said, having fully assessed urban capacity, it is recognised that the development needs of the Borough cannot be met within the existing urban area and so a managed approach to Green Belt

		released is put forward within the Proposed Submission Version Local Plan. All sites/developments should be supported by appropriate infrastructure, irrespective of their location.
Support for the identification of new primary schools within the existing urban area, including at Peel Hall.	Other stakeholders	Noted. A detailed assessment of education needs as a result of the development proposed within the plan period has been carried out. The Council considers that the proposals within the Proposed Submission Version Local Plan meet all education needs within the Borough.
The majority of houses in the wider urban area could be delivered within the first 10 years. Although, we would need the Council to provide more evidence on this through the preparation of a 'site by site' trajectory.	Residents, developers/agents	The Council has produced a development trajectory which confirms the anticipated delivery rates on individual sites over the plan period. This identifies that most sites within the urban area will come forward within the first 10 years of the plan period.
The wider urban area contains many of the strategic employment sites for the region, as well as significant retail and leisure sites. It is noted that the Council's latest Infrastructure Delivery Plan (IDP) will be updated ahead of the publication of the submission version of the Local Plan. A series of key schemes, including east-west road improvements, should be introduced.	Residents, developers/agents	Noted. Infrastructure requirements have been fully considered and the IDP has been updated accordingly.
The PDO identifies that 14,869 dwellings will be delivered in the Wider Urban Area but there is	Developers/agents	The development trajectory has been looked at in much greater detail to inform the preparation of the Proposed Submission Version

no breakdown of what this figure comprises.		Local Plan. This is provided within the plan itself and in the supporting evidence base.
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### **Theme 33: Garden Suburb development proposals**

No of responses Part 1	2
No of responses Part 2	1337
<b>Total</b>	<b>1339</b>

#### **Overview**

There was a significant level of response on the Garden Suburb. There was a range of responses from developers, landowners and agents as well as residents and community groups. There were also detailed responses from Borough Councillors, Parish Councillors and Parish Councils.

#### **Key Issues**

Respondents generally commented on the scale of the proposed Garden Suburb and the need for infrastructure in this part of the Borough. In particular, traffic congestion in south Warrington was frequently raised as a concern. Many respondents felt this level of development would change the nature of south Warrington significantly and the town centre would not benefit as residents would commute to Liverpool and Manchester.

Of the submissions from developers, landowners and agents, they were generally supportive of the Garden Suburb, with some also pushing for a larger allocation and greater Green Belt release, along with higher delivery rates.

Responses from the community generally objected to the scale of the proposal and its impact upon existing residents, roads, air quality, services, heritage assets, open countryside and wildlife.

#### **Conclusion**

Having considered all the representations received, and having regard to the various changes to planning policy at a national level which have come into force since the Preferred Development Option consultation in 2017, the Council has re-calculated its housing requirement and amended the amount of land to be released from the Green Belt.

Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan

The conclusions of the options assessment process still support the allocation of the Garden Suburb and South West urban extension with incremental growth in the outlying settlements. The overall level of Green Belt release is lower than that that proposed in the PDO.

In terms of the Garden Suburb, this has been reduced in scale from approximately 7,000 units to approximately 5,000 units. Land previously identified as safeguarded land to the east of Knutsford Road will now be kept in the Green Belt and the number of houses within the Garden Suburb area has been significantly reduced and with a substantial amount of land (between development parcels) remaining open and rural in nature.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 33.

Table 33: Garden Suburb development proposals - Representations and Responses

Issue	Respondent Type	Council Response
Garden Suburb is too big and the scale of development is not needed.	Residents, elected representatives	The demand for both the proposed residential and employment uses in this location has been determined through the assessment of demographic and economic forecasts as well as previous levels of development in Warrington. The level of housing required is now determined through a standard methodology issued by Central Government – and this has been evolving as we have prepared the Proposed Submission Version Local Plan. The latest forecasts result in a lower housing figure for Warrington than that set out in the Preferred Development Option in 2017. This has been MD2reflected through a reduction in the Garden Suburb from approximately 7,000 homes to approximately 5,000 homes within the plan period.
Area of Green Belt release is too large and erodes the important role of the GB in this location.	Residents, elected representatives, developers/agents	As a result of the reduction in number of new homes needed, the Garden Suburb has been reduced in scale since the Preferred Development Option was published in 2017. In turn, this means that a reduced amount of Green Belt land is required to meet Warrington’s development needs up to 2037. Aside from a relatively small amount of employment land close to the M6 Junction 20, land to the east of Knutsford Road will not now be released from the Green Belt.
Green Belt release should occur on both sides of M6.	Developers/agents	Land to the east of the M6 is not considered appropriate for Green Belt release to facilitate growth of the main urban area of Warrington – the Green Belt parcels in this location perform a strong role in the context of Lymm and the main urban area of Warrington. As detailed above, the area of Green Belt to be released for the Garden Suburb has in fact been reduced in accordance with changing demographic forecasts. A relatively small amount of Green Belt is proposed to be released immediately

		adjacent to the boundary of Lymm to support its own development needs.
Development is too concentrated in south Warrington.	Residents, elected representatives	The development strategy which underpins the Proposed Submission Version Local Plan takes a brownfield first approach which seeks to direct development to the existing urban area in the first instance. Using demographic and economic forecasts the Council has determined that there is insufficient capacity within the main urban area and existing settlements to deliver the necessary development Warrington will need over the next 20 year period. As a result, some Green Belt land will need to be released for development. A detailed process of site assessments in all parts of the Borough has been undertaken with the Garden Suburb being identified as one of the best areas for Green Belt release and subsequent development.
Concerns about strategic road infrastructure.	Other stakeholders	In working on the concept masterplan for the Garden Suburb, the Council has liaised closely with Highways England regarding the delivery of strategic road infrastructure and improvements to existing major junctions, the phasing of which has been a key input to the masterplan and Policy MD2 Garden Suburb.
More work needed in relation to impact on habitats and species in the context of the Garden Suburb.	Other stakeholders	Again, this has been an important part of developing the concept masterplan for the Garden Suburb and meetings have been held with statutory consultees such as Natural England during the course of the preparation of the masterplan, and which has subsequently fed into the preparation of Policy MD2 Garden Suburb
Impact on heritage assets	Residents, elected representatives, other stakeholders	Since the PDO consultation, a Heritage Impact Assessment has been undertaken of the Garden Suburb area and the immediate surroundings. The findings of the assessment have informed the masterplan and Policy MD2 of the Proposed Submission Version Local Plan. Historic England has been consulted on the contents of the assessment and has raised no major concerns.
Development trajectory has been over estimated – build rates should be more realistic.	Residents, elected representatives, developers/agents	A significant amount of work has been carried out to ensure that the build rates proposed are achievable and this has been



		reflected in the development trajectory over the plan period. The scale of the Garden Suburb has been reduced as a result of this work. It should be noted however, that it is not anticipated that the entire Garden Suburb will be delivered within the plan period and some development will continue into the next plan period which will be confirmed at a subsequent Local Plan review.
Delivery rates could be higher.	Developers/agents	A significant amount of work has been carried out to ensure that the build rates proposed are achievable and this has been reflected in the Council's development trajectory. The scale of the Garden Suburb has been reduced as a result of this work and it is not considered appropriate to increase delivery rates based on this evidence.
The western gateway of the site J10 M56 should be brought forward as an early phase of development.	Developers/agents	Phasing has been considered in detail as part of the masterplanning process, particularly in relation to road infrastructure, but also in terms of bringing forward both the residential and employment land at appropriate rates. This has been reflected in Policy MD2 which allows for more detailed to phasing to be worked up for different areas in due course.
Reliance on a limited number of landowners to bring forward a significant development.	Residents, developers/agents	Warrington & Co, the Council's economic development and regeneration team, have engaged with developers and landowners to ensure that this issue is addressed.
Requires a mechanism to capture uplift.	Developers/agents	Warrington & Co have engaged with developers and landowners to ensure that this issue is fully addressed. This requirement is reflected in Policy MD2.
There are 3 designated local wildlife sites and other important habitat.	Residents, elected representatives	Local designated sites and other important wildlife/habitat have been considered as part of the masterplanning process and have informed the concept masterplan. Detailed discussions have been held with Natural England. Further work will be required to progress the various areas within the Garden Suburb and more detailed assessments will be carried out. This is identified in Policy MD2.
Impact on air quality	Residents, elected representatives	The Council has commissioned consultants to assess the impact of the

		proposed development on air quality. The study concludes that air quality will be acceptable for residents both in the Garden Suburb and within the wider Borough. The Garden Suburb will seek to limit dependency on the car and appropriate stand-off distances with the two motorways will be maintained.
Impact on existing villages of Thelwall and Grappenhall	Residents, elected representatives	The concept masterplan for the Garden Suburb has been designed to respect existing settlements and villages both within the boundary and beyond it within the existing urban area. Through sensitive design and landscaping the existing villages can be protected. Specific details will be required in more detailed masterplanning exercises for different parts of the Garden Suburb. This is required as part of Policy MD2.
Concerns regarding local traffic movements	Residents, elected representatives	The Garden Suburb will include appropriate road infrastructure which will include strategic and local road infrastructure. In addition connection points on to the existing road network will be improved where required. Public transport provision to south Warrington, and specifically to the Garden Suburb, will also be improved as part of the development proposals. Policy MD2 ensures that infrastructure will be delivered in a phased manner, with some of the more major road infrastructure required before development parcels can be released.
Concerns about delivery of infrastructure with development	Residents, elected representatives, developers/agents	The timing and delivery of infrastructure within the Garden Suburb has been a key determinant in the phasing of the development area and the development trajectory of the overall Proposed Submission Version Local Plan. Indeed, some infrastructure will need to be implemented before any development is commenced. Policy MD2 will ensure that the phasing plan which has been identified through the masterplanning process will be adhered to when it comes to developing individual site parcels.
Impact on local services and need for social infrastructure	Residents, elected representatives	A detailed assessment of existing services and facilities has been undertaken, along with an assessment of future needs. New facilities and services have then been

		considered in terms of land take and factored in to the masterplan for the Garden Suburb. In some instances, improvements to existing facilities may be preferable and this will be articulated to developers on a site by site basis when specific development parcels come forward.
The route for Howshoots link road should be allocated as part of the housing allocation and not safeguarded land.	Developers/agents	A new distributor road link to support the Garden Suburb is a key requirement of Policy MD2. The Howshoots link was a proposal from the original New Town Plan and could form part of the distributor link. Policy MD2 establishes the principles of the link, but its precise alignment will be confirmed through more detailed masterplanning work and will be subject to further consultation.
Concerns about the provision of affordable housing in this area.	Residents, elected representatives	We recognise the concerns regarding affordable housing in south Warrington and we have sought to ensure that affordable homes here are genuinely affordable. The LHNA identifies a way to calculate what is affordable based on wages/rents and house prices. This has been considered in Policy DEV2 Meeting Warrington's Housing Needs and is also referred to within Policy MD2. The Council's housing team have also provided guidance as to what the demand for affordable housing currently is and what it may be in the future.
Flexibility required in relation to densities.	Developers/agents	The concept masterplan has been developed based on different densities depending on whether plots are within one of the three 'villages' or close to the neighbourhood centre. The lowest density considered appropriate is 20dph (gross), however this will vary on a plot by plot basis depending on site constraints and other factors which emerge at detailed design stage. The masterplan and Policy MD2 allow for this and set minimum densities.
Proposed development plots need to be considered in greater detail in dialogue with landowners.	Developers/agents	Landowners have been contacted in relation to the development proposals for the Garden Suburb and they have been engaged in the preparation of the concept masterplan which has been produced to underpin the Local Plan allocation. It has been emphasised that development

		cannot come forward on this site without a significant amount of infrastructure to support it and all landowners have agreed with this principle and understand the need for a comprehensive approach.
Concerns regarding the amount of retail and leisure development proposed in the district centre and whether there will be demand for it.	Residents, elected representatives, developers/agents	An update of the Retail Study has been prepared to support the Proposed Submission Version Local Plan. This confirms that the amount of retail and leisure facilities proposed within the Garden Suburb, largely within the neighbourhood centre, should be of a scale that serves the new development itself. This element of the proposals will not be significant enough to attract passing trade, for example from the nearby motorways.
District centre is too big and should be more tightly defined.	Developers/agents	As part of the masterplanning process which underpins the allocation of the Garden Suburb within the Proposed Submission Version Local Plan, the proposed neighbourhood centre (was district centre) has been reduced. This has been as a result of the general reduction in size of the Garden Suburb and also a more detailed analysis of the land take required for the various services and facilities since the Preferred Development Option was produced.
No major public transport facilities in this area so development will be car reliant and unsustainable.	Residents, elected representatives	A comprehensive range of transport measures is proposed as part of the delivery of the Garden Suburb to reduce reliance upon the car – this approach is set out in Policy MD2. Given the limited opportunity for rail links in this area, bus services will be improved between the Garden Suburb and the town centre, as well as the proposed employment site. The introduction of a mass transit system will be continually reviewed as the development progresses and as the Local Plan is reviewed in due course. Flexibility has been built into the masterplan to allow proposed roads to be used by various modes of transport to ensure that travel needs can be fully met over time.
Queries over the location of safeguarded land.	Residents, elected representatives, developers/agents	The Council's approach to the inclusion of safeguarded land as evolved since publication of the PDO. The Council is no longer proposing to safeguard any land. Land to the east of the A50, with the

		<p>exception of a relatively small parcel of land at the motorway junction, will remain in the Green Belt. The Garden Suburb allocation will however deliver housing completions beyond the end of the Plan Period.</p>
<p>Some development within the Garden Suburb should come forward in the first 5 years and phasing should not be restrictive in this regard.</p>	<p>Developers/agents</p>	<p>In terms of housing completions, it is not anticipated that there will be any within the Garden Suburb in the first 5 years of the plan period. This is due to the need for extensive infrastructure in the Garden Suburb to facilitate development. Having considered appropriate lead in times and delivery rates, it is anticipated that the first completions will realistically emerge in years 5-10. There may be some employment development during years 0-5, again this will be dependent upon infrastructure delivery which is clearly specified in Policy MD2.</p>

### **Theme 34: Port Warrington development proposals**

No of responses Part 1	1
No of responses Part 2	231
<b>Total</b>	<b>232</b>

#### **Overview**

There was relatively high response in respect of the PDO proposals for Port Warrington. Responses were predominantly from residents with responses also received from Councillors, Parish Council's, agents, stakeholders and Neighbouring Councils. Responses were overwhelming made at the second stage of the regulation 18 consultation.

#### **Key Issues**

The majority of responses showed opposition to the development of the Port Warrington Development. The reasoning was mainly due to the impact on Moore Nature Reserve and increase of traffic through the area including heavy goods vehicles causing pollution, noise and congestion. Concerns were also expressed in respect of the potential negative impact on livelihoods to the residents of Promenade Park and how the development will not result in a significant gain in the number of jobs to the local area due to automation.

#### **Conclusion**

Having considered the representations the Council intends to continue with its proposal to allocate Port Warrington for employment uses in the Proposed Submission Version of the Local Plan.

There is an evidenced need for land to meet future employment needs, provided in the updated Economic Development Needs Study 2019). This study together with evidence provided by the developer promoting the expansion of Port Warrington indicates a need for a multi-modal port facility in the Warrington area.

There is however the need to ensure extensive mitigation to offset the loss of part of Moore Nature reserve. The developer promoting the site has produced a detailed assessment of the ecological assets that would be lost and a strategy for mitigation. The allocation Policy will require this mitigation to result in net biodiversity gains.

Development of Port Warrington cannot be accommodated by the existing transport arrangements. The allocation policy therefore ensures that development cannot come forward without the Western Link.

Having taken into account all representations, the Council considers that Policy MD1 of the Proposed Submission Version Local Plan can secure the necessary infrastructure improvements at appropriate times and provide appropriate measures to protect the amenity of both existing and future residents.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 34.

Table 34: Port Warrington development proposals – Issues and Responses

Issue	Respondent Type	Council Response
<p>The study identifies the Manchester Ship Canal as a key asset and promotes the expansion of Port Warrington. It is essential that any expansion of the port or intensification of operations is the subject of consultation with neighbouring authorities that could be effected, for example, through an increase in shipping movements on the ship canal or where there is the potential for impact on designated European sites which are located outside of Warrington authority area.</p>	<p>Neighboring Councils</p>	<p>Comments noted. Since the PDO consultation the Council has undertaken a number of DtC meetings with neighbouring authorities and will continue to do.</p>
<p>Support for the allocation of the Waterfront and Port Warrington.</p>	<p>Residents, developers/agents</p>	<p>Support noted.</p>
<p>There would be a devastating impact on the lives of the residents of Promenade park. The area is regularly commended by the Cheshire Best Kept Village Judges. Port Warrington would be developed next to it, so the community would experience noise and disruption which would make homes worthless.</p>	<p>Residents, elected representatives, other stakeholders and Neighboring Councils</p>	<p>Consideration has been given to the potential impacts on Promenade Park. Policy MD1 of the Proposed Submission Version Local Plan includes safeguards to ensure that the overall Waterfront area will be designed to ensure Port Warrington and the Business Hub do not impact upon the amenity of the existing communities, including those on the south side of the MSC in Halton.</p>
<p>Moore Nature Reserve would be lost with the development of Port Warrington.</p>	<p>Residents, elected representatives, other stakeholders and Neighboring Councils</p>	<p>It is acknowledged that the allocation of Port Warrington will result in the loss of a significant portion of the existing Local Wildlife Site. Policy MD1 of the Proposed Submission Version Local Plan requires the agreement of mitigation for the loss of part of Moore Nature Reserve before any expansion of Port</p>

		Warrington is permitted. The mitigation package is required to ensure a net gain in biodiversity with new and improved habitat for local wildlife to be created within and in close proximity to the Waterfront area, including at the new Country Park. The Policy has been developed in consultation with Natural England.
Warrington does not need to be a port, try encouraging light industries, I.T etc. These industries do not involve transporting hazardous waste near heavily populated areas.	Residents	The Council's Economic Development Assessment has identified the need for new employment land to meet Warrington's long term development needs. It is considered that Port Warrington will make a major contribution to meeting these needs. The developer promoting the site has also provided a detailed needs assessment specially relating to the need for new Port Facilities serving the Manchester Ship Canal.
Manor Park Industrial estate should be an alternative area for this development.	Residents	The developer's justification document to support the expansion of Port Warrington includes a review of alternative sites. The Manor Park Industrial Estate has been discounted as it does not have any potential for a rail link.
A noise assessment and suitable mitigation measures for the site are needed.	Residents	Since the PDO consultation the developer promoting the site has provided additional technical information in support of the site allocation. This incorporates a noise assessment.
The level of noise is currently unacceptable in this area. There are concerns that further development will mean more disruption and noise. This noise could potentially be 24/7, what is there to suggest that this will not be the case?	Residents	Policy MD1 of the Proposed Submission Version Local Plan stipulates that the design of the employment area must protect the amenity of the residential area within the Waterfront and protect the amenity of existing



		residents to the south of the Manchester Ship Canal in Halton.
Peel have announced their ambitions to create Port Warrington as part of the Atlantic Gateway. Much more traffic on the Manchester Ship Canal will have Warrington continually gridlocked and Warrington will become inaccessible to those who live in South Warrington. What is proposed to ensure that development will not be detrimental to movement and accessibility?	Residents	The Western link will help ease the town's long standing issues with congestion by linking the A56 Chester Road with the A57 in Great Sankey. This will significantly improve north south movements through the Borough by providing a second high level crossing of the MSC that is not dependant on shipping movements.
Concerned about access to Port Warrington given its scale and lack of information about the development. Port Warrington will allow considerable commercial development in the centre of town. This would bring large volumes of traffic (commercial/Heavy Goods and private) onto the centre's road network, right where the roads are busiest. How will this be mitigated?	Residents, Neighbouring Councils	The Western Link will be the primary access route serving the Waterfront (including Port Warrington). The Western Link is now classed an official council scheme, following approval by the Council's Executive Board. Policy MD1 of the Proposed Submission Version Local Plan stipulates that development on any of the Waterfront site cannot come forward until the funding and the programme for the delivery of the Western Link have been confirmed.
Port Warrington only got past planning permission on the provision that it was reinstated as a rail link but there has been no mention of this since in the PDO.	Residents	Policy MD1 of the Proposed Submission Version Local Plan stipulates that the first operation/use of the expanded Port Warrington will be not be permitted until the expansion of either the berth or the rail freight connection has been completed and a programme for the implementation of the subsequent berth extension or railway infrastructure has been confirmed.
No evidence provided supporting need for additional port facilities in this location.	Residents, elected representatives, other stakeholders	The existing LPCS (Policy CS11) recognises that further development at Port Warrington may be able to demonstrate "very special circumstances" by virtue of the
No 'exceptional circumstances' outlined to remove Port Warrington from	Residents, other stakeholders	

<p>Green Belt.</p>		<p>fixed location of the infrastructure and the potential for connection to a -modal sustainable transport network. Since the PDO consultation a Development Framework Document has been produced by the developer promoting the site that provides an updated need case for Port Warrington.</p>
<p>Alternatives for commercial port facilities on the Ship canal have not been adequately explored with neighbouring local authorities and there is no evidence that this issue has been considered under the 'Duty to Cooperate'.</p>	<p>Residents, other stakeholders</p>	<p>The developer promoting the site has provided detailed information setting out the need for the expansion of Port Warrington, including an assessment of the potential of other locations on the Manchester Ship Canal.</p>
<p>Not many jobs will be created here when the development finishes and technology transforms the warehouses into automated centres.</p>	<p>Residents</p>	<p>Since the PDO consultation a Development Framework Document has been produced by the developer promoting the site that appraises the economic benefits of Port Warrington, including estimated levels of employment generation. The Council is confident that the Port will provide a wide range of employment opportunities for local residents.</p>

### Theme 35: South West Urban Extension development proposals

No of responses Part 1	16
No of responses Part 2	750
<b>Total</b>	<b>766</b>

#### Overview

Issues regarding the South West Urban Extension (SWUE) have been raised by a number of residents, Borough Councillors, Parish Council's, agents and Neighbouring Councils. Responses were overwhelming made at the second stage of the Regulation 18 consultation.

#### Key Issues

There was a significant level of objection to the proposal from residents and local Parish Councils. Respondents generally expressed concern to the scale of the proposed SWUE and the associated loss of Green Belt generally and specifically the merging of urban areas of Warrington and Halton. In addition, responses from the community generally objected to

- the loss of agricultural land, wildlife habitat and recreation resource;
- the impact of increased traffic and associated congestion; and
- no acknowledgement or protection of heritage assets in the area (including Moore Village CA);
- proposed allocation undermining the PDO's objective for development of inner Warrington; and
- residential development within a COMAH zone and conversely the potential of residential development to limit the activities of the existing chemical works.

Of the submissions from developers, landowners and agents, they were generally supportive of the SWUE, however, there were concerns regarding the timing and delivery of infrastructure, in particular the Western Link.

#### Conclusions

Having considered all the representations received, and having regard to the various changes to planning policy at a national level which have come into force since the Preferred Development Option consultation in 2017, the Council has re-calculated its housing requirement and amended the amount of land to be released from the Green Belt.

Given the number of nature of representations made to the Preferred Development Option consultation, the Council has carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan

The conclusions of the options assessment process still support the allocation of the Garden Suburb and South West urban extension with incremental growth in the outlying settlements. The overall level of Green Belt release is lower than that that proposed in the PDO.

In terms of the SWUE, this has been reduced in scale from approximately 1,800 units to 1,600 units and the site boundary has been revised to increase the separation between the site and Moore Village.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 35.

Table 35: South West Urban Extension development proposals - Issues and Responses

Issue	Respondent Type	Council Response
The new proposed road (Western Link) will move congestion from Bank Quay/Chester Road to another area instead of solving it.	Residents	Consultation on the Western Link has been undertaken through a separate process to that of the Local Plan.
Objection to the scale of development being proposed for South Warrington and the SW Extension. There seems to be little quantifiable justification for such a massive expansion of housing and necessary infrastructure which will lead to the destruction of most of the current Green Belt between Walton and Moore. The GB in this area provides a buffer to separate Warrington and Halton.	Residents, elected representatives, Neighbouring Councils	The level of housing required is now determined through a standard methodology issued by Central Government – and this has been evolving as the Council have prepared the Proposed Submission Version Local Plan. The latest forecasts result in a lower housing figure for Warrington than that set out in the Preferred Development Option in 2017. This has been reflected through a reduction in the SWUE from approximately 2,000 homes to approximately 1,600 homes over the plan period. In addition, since the PDO consultation, the responses have been assessed and have informed the drafting of Policy MD3 of the Proposed Submission Version Local Plan, which has resulted in a reduced site area that leaves a greater gap between Warrington and Halton.
Although proposals seek to provide new infrastructure to facilitate the building of 2,000 new homes (in line with Objective W4), they would conflict with Objective W5, as many residents currently enjoy the countryside around Moore and Walton.	Residents	Policy MD3 of the Proposed Submission Version Local Plan requires the provision of; a new local park and areas of strategic open space comprising of a minimum of 32 ha; and the provision of a range of smaller areas of open space within the residential development.
Concern over impact on village of Moore. The ARUP assessment only considered impacts on Warrington borough and not neighbouring areas.	Residents, Neighbouring Councils	The Green Belt Assessment did consider the location of towns in neighbouring boroughs when assessing development parcels and proposed sites.  As a result of the PDO consultation the SWUE site boundary has been revised. Policy MD3 of the Proposed Submission Version Local Plan has a reduced site

		area that leaves a greater gap between Warrington and Halton.
Support - right location for development. However current access link to town centre is highly congested, new link including 1 or 2 high level bridges over the Ship Canal are required along with redesigning the link between the A56 and A50. Public transport links also need to be included.	Resident	Support noted. Policy MD3 of the Proposed Submission Version Local Plan requires that; no development will be permitted until funding has been secured and a programme of construction has been confirmed for the Western Link; and a comprehensive package of transport improvements to support the urban extension, including; improved cycling and walking routes well related to the green infrastructure network; and public transport enhancements to connect the new community with Stockton Heath, Warrington Town Centre, the Waterfront Development, the new Garden Suburb and other major employment areas, including Daresbury.
There are a number of significant historic/listed buildings in Walton affected by the proposals. Also, the SWUE would affect the historic character and heritage assets (conservation area and listed buildings) of the village of Moore.	Residents	Since the PDO consultation, a Heritage Impact Assessment has been undertaken of the SWUE and the immediate surroundings. Historic England have been consulted and are part of the preparation of the Heritage Impact Assessment. The findings of the assessment have informed Policy MD3 of the Proposed Submission Version Local Plan.
Stockton Heath is not mentioned specifically by the PDO but the impact of the Garden City Suburb and SW Extension on the village will be enormous.	Resident	A detailed assessment of existing services and facilities has been undertaken, along with an assessment of future needs. This confirmed the pressure on services in Stockton Heath. New facilities and services are therefore required to be provided in the SWUE by Policy MD3 of the Proposed Submission Version Local Plan, along with improvements to public transport, cycling and walking connections to other nearby service centres, including the Town Centre.
Due to the scale of the proposed SW Extension Manchester Airport would appreciate being included in any future discussions surrounding the preparation of any masterplan.	Other stakeholders	Comment noted.
SWUE proposals will have a	Residents, elected	Since the PDO consultation, the

<p>detrimental impact on the village of Moore, for not only its residents but also the many others who currently enjoy the countryside and green spaces. Whilst, the need for development, affordable housing and improved infrastructure to aid congestion is understood, the wholesale destruction of the Green Belt between Moore and Walton to build 2,000 new homes is totally unacceptable. This proposal would link Warrington with Runcorn. One of the main purposes of Green Belt (NPPF) is to prevent urban sprawl, protect the countryside from encroachment and to stop settlements from joining together. The Green Belt requirements of the NPPF have been totally ignored.</p>	<p>representatives</p>	<p>responses have been assessed and have informed the drafting of Policy MD3 of the Proposed Submission Version Local Plan, which has resulted in a reduced site area that leaves a greater gap between Warrington and Halton; and the requirement for the provision of; a new local park and areas of strategic open space comprising of a minimum of 32 ha and the provision of a range of smaller areas of open space within the residential development.</p>
<p>This development will result in: loss of productive agricultural land.</p>	<p>Residents</p>	<p>The land in the SWUE is classified as Grade 2 and 3 agricultural land.</p> <p>The allocation will result in the loss of agricultural land, but the vast majority of land in the borough currently in active agricultural use, or with the potential for agricultural use, will be protected. The value of agricultural land was a consideration in the options assessment and Sustainability Appraisal process.</p>
<p>SWUE will exacerbate pollution, and health issues.</p>	<p>Residents</p>	<p>The Council has commissioned consultants to assess the impact of the proposed development on air quality. The study concludes that air quality will be acceptable for residents both in the SWUE and within the wider Borough. The SWUE will seek to limit dependency on the car and provide improved public transport, cycling and walking connections to other areas.</p>
<p>The SW Extension would have an impact on local services (medical centres, education and leisure facilities).</p>	<p>Residents, elected representatives</p>	<p>A detailed assessment of existing services and facilities has been undertaken, along with an assessment of future needs. New facilities and services have then been considered in terms of land take and factored in to the capacity</p>

		of the SW Extension. Policy MD3 of the Proposed Submission Version Local Plan requires the provision of a range of community facilities, including; a two form entry primary school; a new local centre; a health facility and financial contributions towards additional secondary school places and built leisure facilities.
The housing trajectory for the SWUE is unrealistic.	Developers/agents	Since the PDO consultation, the housing capacity and trajectory for the SWUE has been revised to take account of reduced site size and anticipated delivery of the Western Link Road.
Concerns regarding the deliverability of the SWUE due to dependency on the Western Link. With regard to the Western Link, the Council needs greater certainty on funding and delivery and it is currently premature to include all of the land within the development option.	Developers/agents	Since the PDO consultation, the housing trajectory has been revised to take account of the anticipated delivery of the Western Link Road and this been taken into consideration in the drafting of Policy MD3 of the Proposed Submission Version Local Plan. Policy MD3 specifies that development cannot come forward until the funding and the programme for the delivery of the Western Link have been confirmed.
The SWUE is simply untenable without the Western Link. Traffic along the A56 and into Warrington town centre is already congested at peak times. The addition of 1,800 houses would imply possibly 36,000 cars attempting to move in or out along the A56 and could not be sustained.	Residents	A funding bid has been submitted to the DfT for the Western Link and the Council is confident the Western Link will be delivered.
There are concerns regarding the proposed density of 28dph due to the location of the chemical works north of the ship canal. A recent application at Carrington Village had a density of 26.5dph. The SWUE should be more concentrated with a tighter urban core, reducing the amount of GB release and identifying the remainder of the land as safeguarded land.	Developers/agents	The proposed capacity for the site takes account of the COMAH Zones of the industrial uses to the north of the Manchester Ship Canal. Since the PDO consultation the extent of the site has been reduced to take account of concerns raised about the scale of GB release in this location. Policy MD3 of the Proposed Submission Version Local Plan takes these issues into account.
The Plan needs to demonstrate how the proposed allocated sites can be developed without harm to the historic	Residents, developers/agents, other stakeholders	Since the PDO consultation, a Heritage Impact Assessment has been undertaken of the SWUE and the immediate surroundings. Historic England have

<p>environment, heritage assets and their setting. To meet the requirements of the NPPF, as a minimum the proposals should be accompanied by a Heritage Impact Assessment on the Walton Conservation Area and the multiple listed buildings &amp; structures in the area, including impact on their settings; and an assessment of Historic Landscape Character.</p>		<p>been consulted are part of the preparation of the Heritage Impact Assessment. The findings of the assessment have informed Policy MD3 of the Proposed Submission Version Local Plan.</p>
<p>Strong support for the location and inclusion of site in the proposed urban extension. However, concern about proposed residential development within a COMAH zone. If the SWUE goes ahead, the presence of large numbers of homes in the vicinity of the Chemical Works will conflict with any attempts to expand or intensify the use of the works. The NPPF reflects the important principle that existing industries should be protected from new residential development that would restrict them in the future.</p>	<p>Developers/agents</p>	<p>Support noted. The HSE have been consulted and have raised no objections to proposed allocation.</p>
<p>Mechanism to deal with equalisation of land values required and how this will be implemented. All land owners/stakeholders need to be included in Master Planning process to ensure site is deliverable.</p>	<p>Developers/agents</p>	<p>All the land owners have been consulted. The developers promoting the site have confirmed their commitment to ensuring a comprehensive form of development, their support of the build rates which have informed the development trajectory and are supportive of the preparation of a masterplan for the urban extension.</p>
<p>The sustainability appraisal of the SWUE is inadequate in relation to heritage impact, landscape impact and traffic impact. The site performs poorly in respect of a number of measures in the Council's SA including loss of agricultural land, groundwater source protection zones and landscape character. The SA is inaccurate</p>	<p>Residents, developers/agents</p>	<p>The PDO consultation was supported by an Interim Sustainability Appraisal Report that considered the main development locations alternatives for the spatial strategy. Since the PDO consultation a full Sustainability Appraisal has been undertaken to support the Proposed Submission Version Local Plan.  The Council has also undertaken wide</p>



<p>in a number of measures including 3 which should be scored red: ACC5 as Stockton Heath and Stretton Medical centres have no capacity for new residents; BNH1 as this does not consider non-designated heritage assets; and BHN2 as the assessment ignores the impact on the setting of Walton Conservation Area and does not consider the historic landscape and hedges.</p>		<p>range of more detailed evidence base work and updated its Infrastructure Delivery Plan.</p> <p>Since the PDO consultation, a Heritage Impact Assessment has been undertaken of the SWUE and the immediate surroundings. Historic England have been consulted are part of the preparation of the Heritage Impact Assessment. The findings of the assessment have informed Policy MD3 of the Proposed Submission Version Local Plan.</p>
<p>There is no outlined time for when doctor/dentists etc will be built in the area. There are limited shops within the area along with parking.</p>	<p>Resident</p>	<p>Since the PDO consultation, the timing of the delivery of these services has been taken into consideration in the drafting of Policy MD3 of the Proposed Submission Version Local Plan. Policy MD3 specifies that development cannot come forward until full details of the programme and funding for the delivery of all, the necessary infrastructure has been agreed.</p>
<p>Strongly object to SWUE due to the landscape impact. To meet the NPPF requirements there should be a suitable assessment available for the SWUE proposals. The Council's WSWUE Framework Plan Document (June 2017) only briefly covers the topic of landscape sensitivity. This is insufficient and does not meet the requirements of a proper Landscape and Visual Impact Assessment (LVIA). The best available evidence is the Council's Landscape Character Assessment (2007) which is broad-brush and out-of-date. The site falls within broad Area 3.A Appleton Park and Grappenhall areas of the Red Sandstone Escarpment. The Council's own assessment shows that this landscape is, "particularly sensitive to further building development" and that development "will cover some</p>	<p>Elected representatives, developers/agents</p>	<p>There has not been any significant development in the rural areas of the borough since the Landscape Character Assessment (2007) was undertaken. The Council is therefore confident the assessment is an appropriate evidence base to inform the preparation of the Proposed Submission Version Local Plan.</p>

of the most attractive landscape in the Borough”.		
The proposed residential development site D1 in the framework has an access too close to the Western Link junction. There should be no development on the south side of the A56 to avoid a new junction at an already overloaded area of the road.	Developers/agents	The allocation and associated policy has been reviewed in the context of the confirmed route for the Western Link.
Council need to demonstrate degree of certainty that it can provide sustained delivery at the rates anticipated through GCS and SWUE. If delivery falls short of that which is being proposed the plan could fail. This approach combined with the significant focus on the UC is a high risk strategy.	Developers/agents	A significant amount of work has been carried out with developers, Warrington&Co. and other stakeholders to ensure that the build rates proposed are achievable and this has been reflected in the development trajectory over the plan period. The focus on maximising the use of sites within the existing urban area is entirely consistent with Government policy (NPPF - Paragraphs 117 – 123: Making effective use of land). Policy DEV1 of the Proposed Submission Version Local Plan provides a review mechanism should monitoring indicate that a 5-year deliverable and/or subsequent developable supply of housing land over the Plan Period can no longer be sustained.
Proposals for the development should be of good design and respect the character of the surroundings. Residential development should not be permitted in areas where it would demonstrably harm the character or appearance of an area or the amenities enjoyed by the local residents. There will be a significant loss of amenity space for residents. The activities that take part in these areas help to strengthen the cohesiveness of the neighbourhood.	Resident	Since the PDO consultation, the responses have been assessed and have informed the drafting of Policy MD3 of the Proposed Submission Version Local Plan, which has resulted in a reduced site area that leaves a greater gap between Warrington and Halton; and the requirement for the provision of; a new local park and areas of strategic open space comprising of a minimum of 32 ha and the provision of a range of smaller areas of open space within the residential development. The detailed design of the development will be controlled by the site specific Policy MD3 and the general design and environmental protection Policies DC6 and ENV8 of the Proposed Submission Version Local Plan.
The even spread of housing delivery rates across years 6 to	Developers/agents	All the land owners have been consulted. The developers promoting the site have

<p>20 of the Plan Period are not justified.</p>		<p>confirmed their commitment to ensuring a comprehensive form of development and their support of the build rates which have informed the development trajectory.</p>
<p>This is clearly a large strategic allocation, requiring significant supporting infrastructure and service delivery, with or without the link road, and therefore issues of phasing and trajectory need careful consideration. Pegasus's assessment draws upon evidence on lead in times and build-out rates for large residential sites from three reports/assessments, which are all based on a large amount of empirical data. By using the most recent Lichfield's report the methodology would suggest a lead in time of 10.4 years, which would see delivery beginning 2/3 of the way through 2027/28, then continuing at 135dpa. This would suggest total delivery of 1,262 within the plan period, with a further 569 beyond.</p>	<p>Developers/agents</p>	<p>Since the PDO consultation, the housing capacity and trajectory for the SWUE has been revised to take account of the anticipated delivery of the Western Link Road. A significant amount of work has been carried out with developers, Warrington&amp;Co. and other stakeholders to ensure that the build rates proposed are achievable and this has been reflected in the development trajectory over the plan period as a whole. The developers promoting the SWUE have confirmed their commitment to ensuring a comprehensive form of development and their support for the build rates which have informed the development trajectory.</p>
<p>The PDO focuses on South Warrington but does not mention how it intends to improve the urban environment and quality of life for the existing residents. Garden City and SW Warrington not the only way to achieve Warrington's needs.</p>	<p>Residents</p>	<p>It is the intention that Warrington's growth will be positively planned to ensure that new homes, jobs and businesses are supported by major improvements to the Borough's infrastructure, to the benefit of both existing and new communities alike. Since the PDO consultation, the drafting of the Proposed Submission Version Local Plan has outlined in more detail how this will be achieved.</p>
<p>We acknowledge that a more detailed assessment of highway capacity will be required to confirm the development trajectory of the SW Warrington Urban Extension. The scheme layout itself and the resultant impacts upon the SRN will be influenced by the final route and delivery of the</p>	<p>Other stakeholders</p>	<p>In preparing the Proposed Submission Version Local Plan, Officers from departments of the Council have worked extensively with Highways England through the Duty to Cooperate process to ensure that the evidence base and the Submission Version Local Plan Policies are appropriate to protect and enhance the Local and Strategic Road Network.</p>

<p>'Western Link'. Highways England would like to see the modelled evidence of the performance and effects of the Western Link on the SRN.</p>		<p>Highways England will be aware that the Council's Warrington Multi Modal Transport Model (2016) has been developed to test the highway implication of the proposed amount and location of development. This has taken into account the performance and effects of the Western Link.</p>
<p>Concerned about flooding in the area and the possibility of the land been a flood plain.</p>	<p>Resident</p>	<p>The Council has undertaken a Strategic Flood Risk Assessment in support of the Local Plan which has considered all potential allocation sites. There is a small proportion of the site at risk of flooding and this has been taken into account in confirming the allocation and associated allocation policy.</p>
<p>The development appears to overlay pre-existing villages and suburbs therefore it appears these communities will be majorly affected with house price devaluation as a result.</p>	<p>Resident</p>	<p>The Council has considered the impact on the surrounding areas as part of its options assessment and more detailed site assessment work. The potential impact on the property values is not a consideration for the Local Plan.</p>
<p>Unnecessary loss of Green Belt. Development should be confined to brownfield land.</p>	<p>Residents</p>	<p>The Council have undertaken a detailed Urban Capacity Assessment that takes account of all available brownfield land both within the existing urban area and in the Green Belt.</p>
<p>Warrington's infrastructure needs to be improved before any significant development starts.</p>	<p>Residents</p>	<p>Since the PDO consultation, the timing of the delivery of these services has been taken into consideration in the drafting of Policy MD3 of the Proposed Submission Version Local Plan. Policy MD3 specifies that development cannot come forward until full details of the programme and funding for the delivery of all the, necessary infrastructure has been agreed.</p>
<p>The traffic impacts of this proposal together with future development in Halton are unacceptable and have been inadequately considered. The SWUE will result in an unacceptable increase in traffic on already congested road routes in the surrounding area and particularly when taking into consideration proposed development in the town centre.</p>	<p>Resident, developers/agents</p>	<p>The Council's Warrington Multi Modal Transport Model (2016) has been developed to test the highway implication of the proposed amount and location of development.</p> <p>As a result of this work, the allocation policy for the South West Urban Extension is clear that development cannot come forward until the funding and the programme for the delivery of the Western Link have been confirmed.</p>

<p>This development would further impact on the traffic problems already existing on the Walton and Stockton Heath swing bridge crossings into the town.</p>	<p>Resident</p>	
<p>The plan is an opportunity not a threat and as such should be treated as a way of 'fixing' transport, infrastructure and community place making. The plan should consider maximising the benefits of creating / remodelling village settings to make them people friendly, maximising the setting of historic buildings and creating green spaces central to a village, ideally with green corridors to the proposed country park.</p>	<p>Resident</p>	<p>Comments noted.</p>
<p>Too high a housing density for the area.</p>	<p>Resident</p>	<p>The housing density is based on evidence on densities that has been collected to support capacity work for the SHLAA and Master planning work.</p>
<p>Development should be focused on the town centre and Omega, where jobs are located to reduce commuting.</p>	<p>Resident</p>	<p>The proposed Draft Local Plan does focus development within the existing urban area and close to the Town Centre for these reasons.</p>
<p>We have not been supplied with any information regarding this development.</p>	<p>Resident</p>	<p>The PDO consultation provided details of proposed SWUE, including the housing capacity and trajectory, outline details of infrastructure requirements and a development concept plan.</p>
<p>The farmers should be encouraged to keep their land as the UK exit from the EEU we will need more food to be produced in the UK to be more self-sufficient.</p>	<p>Resident</p>	<p>The allocation will result in the loss of agricultural land, but the vast majority of land in the borough currently in active agricultural use, or with the potential for agricultural use, will be protected. The value of agricultural land was a consideration in the options assessment and sustainability appraisal process.</p>

### Theme 36: Outlying Settlements development proposals

No of responses Part 1	6
No of responses Part 2	964
<b>Total</b>	<b>970</b>

#### **Overview**

There was a significant level of response on the issue of the Outlying Settlements. There was a range of responses from residents, developers, landowners, stakeholders, agents, Borough Councillors, Parish Councillors and Parish Councils. Responses were overwhelming made at the second stage of the regulation 18 consultation.

#### **Key Issues**

In terms of outlying settlements the most frequently referred to issue from residents was the potential negative impact of development on these outlying settlements. Whilst, responses referred to all of the settlements, Lymm in particular was highlighted. Responses from residents, Parish Councils and Councillors mainly objected to development as it was considered that the existing settlements did not have the infrastructure to support the proposed growth and that development would dramatically change the character of these settlements.

The main concerns raised by residents, including: the potential strain development would have on existing amenities/facilities and traffic infrastructure; the loss of Green Belt for this development; the potential of urban sprawl; the loss of a 'sense of place' and impact on quality of life in these communities and lastly the desire for residents of these areas to be involved/have a say in the development of their local area.

In terms of comments from agents, developers and landowners, their opinions were much more positive about development in the outlying settlements. Comments received outlined that: more development could be accommodated in these areas; that it would be easier to develop houses in the early stages of the plan in these outlying settlements rather than the Garden Suburb and South West Extension and lastly that development would benefit these areas by providing better infrastructure provision and facilities and also help sustain existing services.

#### **Conclusion**

Since the PDO consultation, the evidence base has been updated, expanded and refined to support the preparation of the draft Local Plan, taking into account the responses to the PDO consultation.

The Council has re-assessed the option of a greater proportion of development being located in the settlements. Following this assessment the Council still considers that a greater amount of development in the settlements would result in greater character impacts and provide a weaker contribution to supporting the growth of the main urban area.

The Council has consulted relevant service providers to ensure that the existing infrastructure can accommodate the 'incremental' level of growth proposed for each settlement.

A summary of all issues under this theme and the Council’s response to them are set out below in Table 36.

**Table 36: Outlying Settlements development proposals –Issues and Responses**

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
Concerns expressed in respect of all of the outlying settlements regarding the levels of existing services/infrastructure (ie. doctors, dentists, schools, local shops, recreation facilities and road capacity) and their ability to cope with any additional housing development.	Residents, elected representatives	The Council used a proportionate technical evidence base to support the options assessment process. Since the PDO consultation, the evidence base has been updated, expanded and refined to support the preparation of the Proposed Submission Version Local Plan, taking into account the response to the PDO consultation. This includes outputs from the
The level of proposed development for Lymm will be contrary to the PDO objectives W2 (Green Belt implications); W4 (Secondary school provision/health care provision/Local road network/Public Transport) and W6 (air quality/pollution).	Residents	Council’s Multi-modal Transport Model; more up to date information about the capacity of existing infrastructure across the borough; an Air Quality Assessment; Heritage Impact Assessments and MSA Impact Assessments. The Council has consulted relevant service providers to ensure that the existing infrastructure can accommodate the ‘incremental’ level of growth proposed for each settlement.
Objection to release of Green Belt around any of the outlying settlements. Further development around the settlements would have a negative impact on their character.	Residents, elected representatives	The Spatial Options process considered the impact of development on the character of an area at a high level. Whilst, individual site assessments considered the impact of allocating specific sites on the character of the area. The Council considers the scale of development proposed relative the size of the settlements means the impact on character will not be detrimental.
Broomedge – Housing development should be allocated to the village. There are local housing needs not being met and the services and businesses need to be sustained by modest levels of new housing. The relative	Resident	With the exception of the removal of Appleton Thorn and Grappenhall Heys as inset settlements, due to the development of the South East Garden Suburb, it is considered that since the adoption of the Local Plan Core Strategy (2014)

<p>affluence of Broomedge would ensure that there would be no viability issues in meeting the full affordable housing policy requirement.</p>		<p>that there have not been any material changes in circumstances that would warrant amendments to the allocation and definition of Inset and Green Belt Settlements.</p> <p>The draft Plan's spatial strategy is only proposing to allocate land adjacent to inset settlements. No development is therefore proposed at Broomedge.</p>
<p>Development should be prioritised to within the inset settlements first. Further assessment of constrained sites should be carried out before proposals are finalised.</p>	<p>Residents</p>	<p>Since the PDO consultation, the Council have undertaken a detailed update of the Urban Capacity Assessment that takes account of all available brownfield land both within the existing urban area and the settlements.</p>
<p>There are plenty of industrial parks which would be better served as land for homes.</p>	<p>Residents</p>	
<p>Housing is best situated near amenities in the central area of the borough rather than outer Green Belt areas.</p>	<p>Residents</p>	
<p>Development of outlying settlements will result in vast urban sprawl.</p>	<p>Residents, elected representatives</p>	<p>The spatial strategy in the Proposed Submission Version Local Plan only proposes modest levels of growth to the outlying settlements.</p>
<p>The historical character of communities including Thelwell, Grappenhall, Appleton and Stretton will be destroyed.</p>	<p>Residents, elected representatives</p>	<p>Since the PDO consultation, Heritage Impact Assessments have been undertaken for all of the site allocation, including the Garden Suburb. Historic England has been consulted as part the preparation of the assessment. The assessment has informed the Garden Suburb allocation policy which makes specific provision to ensure that the heritage assets within the allocation and in the surrounding area will be protected.</p>
<p>It seems developers came to the council with pockets of land they wished to develop profitably rather than looking at what Lymm could manage.</p>	<p>Residents</p>	<p>The Council is required to undertake a 'call of sites' exercise to demonstrate that development options are capable of being delivered. The Council has consulted relevant service providers to ensure that the existing infrastructure can accommodate the 'incremental'</p>



		level of growth proposed for each settlement.
Fully support the decision to hold back detailed site assessment work and confirm sites at a later stage. Pleased to note that Parish Councils may be able to participate in the decision making process through the creation of Neighbourhood Plans.	Elected representatives, other stakeholders	The Council is committed to co-operating with Neighbourhood Plan groups and has considered the emerging Neighbourhood Plan in the preparation of the Proposed Submission Draft Local Plan.  Neighbourhood Plans will provide the opportunity to provide additional detail to site allocations proposed through the Local Plan. They will also be able to prepare more detailed guidance for their Local Areas.
Lymm is embarking on a neighbourhood plan this should be considered in the proposals for this outlying settlement.	Residents, elected representatives, other stakeholders	
Limited consideration of the landscape and visual impact of development in these areas with limited mitigation measures.	Residents, elected representatives	The Council's Landscape Character Assessment (2007) has been use to inform the spatial options and site assessment process. The allocation policies for the settlements contain specific policy requirements where there is a potential impact that needs to be mitigated.
Support for development in the outlying settlements as it would help support local services and widen local housing choice.	Developers/agents	Support noted.
Support for development in the outlying settlements as it would allow delivery of housing in the early stages of the plan period, particularly as the likes of the Garden Suburb and SWUE will not realistically be delivered until the latter stages of the 20-year period.	Developers/agents	Support noted.
The high number of potential sites in outlying settlements warrants a reconsideration of the proportion of housing to be delivered in the main strategic development locations (Garden City Suburb and SW Urban Extension).	Developers/agents	Since the DPO consultation, the Council has re-assessed the option of a greater proportion of development being located in the settlements. Following this assessment the Council still considers that a greater amount of development in the settlements would result in greater character impacts and provide a weaker contribution to supporting the
The outlying settlements have the capacity to accommodate greater levels of development	Developers/agents	

<p>than currently being planned.</p>		<p>growth of the main urban area.</p>
<p>It is feasible that the settlements could accommodate more development without compromising the aspirations of the New City. Thriving outlying settlements will support the Town Centre by providing diverse housing choice for new and future residents and ensure all settlements are able to grow and support existing services in a sustainable manner.</p>	<p>Developers/agents</p>	<p>The Council acknowledges that its assessment of additional growth in the settlements did identify a number of benefits but when considered against other options it was not considered to provide the most sustainable development option for Warrington’s future growth.</p>
<p>Increased housing delivery in the outlying settlements, including Lymm, would drive the economy and contribute significantly to improved infrastructure, facilities and amenities in these settlements. Constraining development in these locations is a missed opportunity to ensure that a robust supply of smaller, deliverable sites in the first five years of the plan is available.</p>	<p>Developers/agents</p>	
<p>The outlying settlement extensions do not represent a sustainable option. The amount of development to the settlements should be reduced and housing redistributed to the urban areas of West Warrington.</p>	<p>Developers/agents</p>	<p>The Council considers that ‘incremental’ development in the settlements is an important element in ensuring the suitability of the draft Local Plan’s spatial strategy.</p> <p>The Council considered additional spatial development options, which included looking at the potential of sites in west Warrington.</p> <p>However, options which included sites to the west did not perform as strongly due to concerns around the fragmented nature of available sites which would make infrastructure delivery difficult and that development is likely to</p>

		<p>impact on the strategic importance of the Green Belt between the main urban area of Warrington and Widnes. There are also concerns regarding the robustness of the revised Green Belt boundaries that would be created from development in the west.</p>
<p>A slightly heavier weighting to the outlying settlements, of perhaps an extra 800-1000 houses between them, coupled with a new estate north between Winwick and Burtonwood would reduce the need for such a large estate in Appleton.</p>	Resident	<p>The Council considered additional spatial development options looking at the potential of sites in north Warrington and options with lower levels of development in south Warrington.</p> <p>Options which included sites in the north did not perform as well due to concerns around the fragmented nature of available sites, which would make infrastructure delivery more difficult, the significant impact on the character of Winwick, transport issues in respect of Junction 9 of the M62/A49 and potential noise and air quality impacts from the motorway. Given the location and fragmented nature of the sites in the north, there is less scope to mitigate these impacts without a significant reduction in development capacity.</p>
<p>Support for the 'Settlement Profiles - Outlying Settlements (July 2017) document, which demonstrates the levels of growth that could be achieved without impact on the strategic importance of the Green Belt.</p>	Developers/agents	Support noted.
<p>The Council should fundamentally re-visit the approach to housing in the settlements. Concerned that restricted level of growth (10%) will have lasting adverse effects on the sustainability of settlements and does not reflect level of market and affordable housing they need.</p>	Developers/agents	<p>The Council used the 10% figure to assist in defining development scenarios.</p> <p>The final allocation of sites in the outlying settlements has been based on detailed site assessments and infrastructure capacity and not strictly limited to 10%.</p>

<p>Where possible community should be reinforced with its own schools, small local shops, play areas and pubs.</p>	<p>Residents, elected representatives</p>	<p>The Council has consulted relevant service providers to ensure that the existing infrastructure can accommodate the level of growth proposed for each settlement. Where necessary the site allocation policies (OS1 to OS9) in the Proposed Submission Version Local Plan require new provision or financial contributions to towards improving existing provision.</p>
<p>Suggest the term 'surrounding villages' is used instead of 'outlying settlements', consider this more user friendly. If this cannot be changed it should be defined in the glossary.</p>	<p>Other stakeholders</p>	<p>Comments noted. However, it is considered appropriate to retain the term "outlying settlements" in order to maintain consistence with the current LPCS and the PDO document.</p>
<p>Any development should cater for local needs, providing social housing and retirement provision. Affordable housing is required for first time buyers.</p>	<p>Residents, elected representatives, other stakeholders</p>	<p>The Proposed Submission Version Local Plan has a general requirement for residential developments of more than 10 units to make provision for affordable housing. Specific consideration is also given to providing homes to meet he needs for elderly people.</p>
<p>Over-development of the settlements will adversely impact on businesses; house prices; visitor rates and the quality of the environment. Development needs to be proportional and carefully planned.</p>	<p>Residents</p>	<p>The justification for the growth scenario's for the settlements is explained in the Area Profiles and Options Assessment Technical Note (Jul 2017). The growth scenario's where based on the capacity of existing infrastructure/services. The</p>
<p>It is being proposed that Lymm takes 42% of all Green Belt released from all the outlying settlements. This seems completely unfair and disproportionate.</p>	<p>Resident</p>	<p>The Council consulted relevant service providers to ensure that the existing infrastructure can accommodate the 'incremental' level of growth proposed. The Council considers the scale of</p>
<p>The Council has produced limited evidence to demonstrate why Croft has been limited to 60 units. There is a wide gap between the identification of 350 dwellings for a settlement extension and the low figure of 60 dwellings for incremental growth with no</p>	<p>Developers/agents</p>	<p>development proposed relative to the size of the settlements means the impact on character under this scenario is proportionate and would not be detrimental.</p>

<p>options in between which would be more appropriate. Client's site has previously been identified as safeguarded land before being reverted back to GB.</p>		
<p>Culcheth – Support for development on the large areas to the north of the village. Then you could put a road (bypass) from Holcroft Lane (B5212) through to the crossroads at the East Lancs road (A580) and Leigh expressway. This would reduce traffic on the A574, which would benefit the village and provide new homes without altering the existing village.</p>	<p>Resident</p>	<p>Since the PDO consultation, the site assessment work for the settlements has been undertaken. The Development Options and Site Assessment Technical Report, explains the assessment process. The sites to the north of Culcheth were either discounted because they were not adjacent or in close proximity to the boundaries of the settlement or because they made a strong contribution to the Green Belt.</p>

### **Theme 37: Meeting the Needs of Gypsy & Travellers**

No of responses Part 1	16
No of responses Part 2	750
<b>Total</b>	<b>766</b>

#### **Overview**

Gypsy & Traveller and Travelling Showpeople issues were raised by a number of residents, Borough Councillors, agents, Parish Council's and stakeholders. Responses were predominantly from residents and also from Councillors, Parish Council's, agents and stakeholders. Responses were overwhelming made at the second stage of the regulation 18 consultation.

#### **Key Issues**

There was a significant amount of support from respondents for the inclusion of Gypsy and Traveller issues in the review of the Local Plan. However, there was a mixed response to the suggested approach for dealing with Gypsy & Travellers and Travelling Showpeople in the PDO. Where respondents objected to the suggested approach it was generally due to the proposed allocation of Green Belt land for the Travelling community.

Other key issues outlined in the responses included: a recognition of the need to identify permanent sites for the travelling community in order to reduce the amount of unauthorised encampments and the associated on going costs of clearing up; the negative effects arising from the use of unauthorised sites due to crime and vandalism; how unauthorised sites are being allocated which is 'rewarding' unlawful activity, and how permanent sites should be allocated.

#### **Conclusion**

Having considered the representations the Council intends to continue to address Gypsy & Traveller and Travelling Showpeople issues in the Proposed Submission Version of the Local Plan as there is considerable support and a policy requirement to doing so.

There is an evidenced need for sites to meet the accommodation requirements of both Gypsy & Travellers and Travelling Showpeople, provided by the updated Gypsy & Traveller Accommodation Assessment (GTAA)(2018).

Since the Preferred Development Option consultation in 2017, the Council has granted planning permission for two permanent sites for Gypsy & Travellers. This has reduced the Council's need for G&T sites significantly. The Gypsy & Traveller Accommodation Assessment (GTAA) (2018) provides an up to date position with regard to Warrington's need in terms of Gypsy & Traveller's and Traveling Showpeople. It identifies a need for 15 further permanent Gypsy and Traveller pitches and 15 plots for Travelling Showpeople between 2017 and 2032 in addition to those consented at the time of the report. This represents a minimum requirement of 5 pitches and 5 plots respectively to be provided within the first 5 years of the plan period to 2022.

Policy MD2 of the Proposed Submission Version Local Plan seeks to make specific provision for a Gypsy and Traveller site with the capacity for 8 pitches within the Garden Suburb.

A summary of all issues under this theme and the Council's response to them are set out below in Table 37.

**Table 37: Meeting the Needs of Gypsy and Travellers – Issues and Responses**

<b>Issue</b>	<b>Respondent Type</b>	<b>Council Response</b>
Green Belt should not be designated for the travelling community as it is protected land that should only be used in exceptional circumstances. Other land should be allocated outside the Green Belt.	Residents	National Green Belt policy (paragraph 136 of the NPPF) allows for the alteration of Green Belt boundaries where exceptional circumstances can be demonstrated. There is an evidenced need for sites to meet the accommodation requirements of both Gypsy & Travellers and Travelling Showpeople and no sites have been identified within the existing urban area.
Support for including Gypsy and Traveller needs in the scope of the proposed Local Plan Review	Residents, elected representatives, developers/agents, other stakeholders	Support noted.
Support for the suggested approach for dealing with Gypsy & Travellers in the PDO.	Residents, elected representatives, developers/agents	Support noted.
Objection to including Gypsy and Traveller needs in the scope of the proposed Local Plan Review.	Developers/agents	It would not be appropriate to deal with Gypsy and Traveller needs through a separate DPD. The issue has already been differed from the current LPCS.
Objection to the suggested approach for dealing with Gypsy & Travellers in the PDO.	Residents, elected representatives, developers/agents, other stakeholders	Objection noted. However, no other suitable new sites have been put forward for consideration and National planning policy (Planning Policy for Traveller Sites - DCLG, 2015) requires local planning authorities to make an assessment of the accommodation needs for Gypsy & Travellers and Travelling Showpeople and to meet that need through the identification of land for sites.
It seems that Gypsy/Travellers are given more consideration in the PDO than the residents of South Warrington.	Residents	The needs of the settled community and the Traveller community have been given equal consideration.
Objection to site being allocated next to Walton Conservation Area.	Elected representatives	This site has now received planning permission and therefore does not need to be allocated. Impacts on heritage issues were

		considered as part of the planning application.
Concern over the proposed Gypsy & Traveller site in Stretton and how it will be managed.	Residents	This site has now received planning permission and therefore does not need to be allocated. The management of the site will be controlled through the planning consent and Site Licence.
Simply allocating existing unauthorised sites rewards unlawful behaviour and encourages the establishment of further such unauthorised sites.	Residents, Neighbouring Councils	No other suitable new sites have been put forward for consideration and National planning policy (Planning Policy for Traveller Sites - DCLG, 2015) requires local planning authorities to make an assessment of the accommodation needs for Gypsy & Travellers and Travelling Showpeople and to meet that need through the identification of land for sites.
Will the Gypsy and Travelling community who are permanently based in Warrington be paying taxes?	Residents	This is not a matter for the Local Plan process.
Table 10 of the PDO states that WBC will need 30 pitches. However WBC are currently in the process of updating its "Gypsy and Travellers Needs Assessment". Would it not be better to complete the needs assessment first, before starting 30 pitches?	Residents	The Gypsy & Traveller Accommodation Assessment (GTAA) has now been updated and the need confirmed.
Where is the research evidence to identify sites for the Gypsy and Traveller Community? There needs to be more transparency on this.	Residents	The need for Gypsy & Traveller and Travelling Showpeople sites is identified in the up dated Gypsy & Traveller Accommodation Assessment (GTAA) (2018). Only two sites have been promoted through the Local Plan for use for Gypsy & Traveller accommodation.
A common problem seems to be low level crime and waste that is left behind on sites, how will this be dealt with?	Residents	Any allocated sites will be properly managed and subject to planning consents and Site Licences that control site operations.
It would be better for the community to have a permanent site like the one at Walton where others could join them for a minimum length of	Residents	Policy MD2 of the Proposed Submission Version Local Plan seeks to make specific provision for a Gypsy and Traveller site with the capacity for 8 pitches within



<p>time. It would save money on Police and those who have to clear up after them.</p>		<p>the Garden Suburb.</p>
<p>There needs to be consultation with the Travelling and Gypsy and community.</p>	<p>Developers/agents, other stakeholders</p>	<p>The Gypsy &amp; Traveller and Travelling Showpeople communities have been consulted as part of the GTAA and through the Local Plan process.</p>
<p>In general the gypsy / traveller community contribute little to society and the economy of Warrington. WBC should not be paying £2m of local tax payers money to relocate an unauthorised encampment.</p>	<p>Resident</p>	<p>No suitable new sites for Travelling showpeople have been but forward for consideration and National planning policy (Planning Policy for Traveller Sites - DCLG, 2015) requires local planning authorities to make an assessment of the accommodation needs for Gypsy &amp; Travellers and Travelling Showpeople and to meet that need through the identification of land for sites.</p>
<p>There does not appear to be any evidence to demonstrate that there has been an assessment of the impact on the historic environment in confirming the preferred locations for Gypsy and Traveller sites.</p>	<p>Other stakeholders</p>	<p>Since the PDO consultation, two of the sites that were proposed to be allocated have received planning permission. The impacts on the historic environment were considered as part the planning application process. The third site is located within the Garden Suburb allocation. This wider allocation has now been subject to a Heritage Impact Assessment.</p>

### Theme 38: Minerals and Waste

No of responses Part 1	15
No of responses Part 2	600
<b>Total</b>	<b>615</b>

#### Overview

Mineral and waste issues were raised by a number of residents, Borough Councillors, agents, Parish Council's and stakeholders. Responses were predominantly from residents with further responses from Councillors, Parish Council's, agents and stakeholders. Responses were overwhelming made at the second stage of the regulation 18 consultation.

#### Key Issues

There was general support from all consultees for the Plan to address mineral and waste issues. Respondents generally commented on the scale of development proposals in the PDO and its influence on waste disposal and how this will be dealt with by the council. In terms of minerals there was concern that development would make mineral extraction more difficult, limiting resources in Warrington and its ability to be self-sufficient.

Respondents generally outlined concerns regarding: the impact of site allocation on the historic environment, the cost of the tax payer to use neighbouring authorities to process waste, the difficulty in understanding the PDO's policy on minerals and waste and how development may take place in sensitive areas (e.g. Moore Nature Reserve or Green Belt land), which may harm the area/or ability to extract minerals.

#### Conclusion

Having considered the representations the Council intends to continue to address both mineral and waste issues in the Proposed Submission Version of the Local Plan as there is overwhelming support for doing so.

The supply of minerals will be managed through the Managed Aggregate Supply System (MASS) in co-operation with the other Mineral Planning Authorities (MPAs) of Greater Manchester, Merseyside and Halton as a single sub-region.

The sustainable management of waste will be promoted and the Council will manage the treatment and disposal of waste through liaison with other authorities who import and export the various waste streams to/from Warrington under the Duty to Cooperate (DtC).

Mineral resources and infrastructure will be safeguarded, as will, existing waste management facilities.

A summary of all issues under this theme and the Council's response to them are set out below in Table 38.

Table 38: Minerals and Waste – Issues and Responses

Issue	Respondent Type	Council Response
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<p>What is the strategy to dispose of extra waste that will be produced by the existing residents?</p>	<p>Residents</p>	<p>The strategy for the management of waste is outlined in Policy ENV1 of the Proposed Submission Version Local Plan. The Council will promote sustainable waste management in accordance with the Waste Hierarchy. In working towards the prevention of waste, Warrington will seek to achieve a reduction in the amount of waste produced in the borough and treat waste at as high a level of the waste hierarchy as practicable by providing appropriate and sustainable sites and/or areas for the management of waste.</p>
<p>General support to consider mineral and waste issues in the scope of the Local Plan review.</p>	<p>Residents, elected representatives, developers/agents, Neighbouring Councils</p>	<p>Support noted.</p>
<p>Disagree with the suggested approach for dealing with minerals and waste issues in the review of the Local Plan.</p>	<p>Residents</p>	<p>It is considered that Minerals and Waste issues need to be included in the review of the Local Plan to ensure it meets the requirements of NPPF, National Planning Policy for Waste (NPPW) and the Waste Framework Directive.</p>
<p>It is positive that the PDO states that the Local Plan will identify MSAs and will seek to safeguard the shallow coal deposit in the area.</p>	<p>Other stakeholders</p>	<p>Support noted.</p>
<p>Sites should be safeguarded if there is a possibility that such minerals can be successfully extracted.</p>	<p>Residents</p>	<p>The Draft Local Plan identifies safeguarded areas for identified mineral deposits of sand, gravel and coal.</p>
<p>Concerns regarding Moore Nature Reserve which should not be used for the extraction of minerals.</p>	<p>Residents, elected representatives</p>	<p>Comments noted. There are no proposals to extract minerals in the vicinity of Moore Nature Reserve.</p>
<p>Fiddlers Ferry Power Station produces ash as a by-product of its power generation. The existing ash processing activities at the site are expected to continue beyond the power station's life span given the current market demand for ash until the existing deposits are fully depleted.</p>	<p>Developers/agents</p>	<p>Comments noted and reflected in Policy DEV4.</p>

<p>No evidence to demonstrate that there has been an assessment of the impact on the historic environment in confirming the preferred approach to minerals and waste allocations and policies.</p>	<p>Other stakeholders</p>	<p>There are no specific mineral or waste allocations in the Proposed Submission Version Local Plan. Policy ENV4 of the Proposed Submission Version Local Plan requires all new mineral related development to demonstrate that it will not have any adverse impacts on the historic environment or that any impacts can be appropriately mitigated.</p>
<p>What is the strategy for minerals? The borough is expected to be self-sufficient and to safeguard mineral deposits for future use. Sand and gravel resources are limited and not sufficient to meet our needs (Section 6.2 of the Minerals Resource Study).</p>	<p>Resident</p>	<p>The borough is not expected to be self-sufficient in minerals. The supply of minerals is managed at a national level through the Managed Aggregate Supply System (MASS). The MPAs of Gtr Manchester, Merseyside, Halton and Warrington co-operate as a single sub-region for the purposes of aggregate supply reflecting their status as a single aggregate apportionment sub-region under MASS.</p>
<p>Sand and gravel resources lie within the proposed South West Urban Extension (Minerals Resource Study, Fig 2). How is the Council proposing to safeguard these resources (including a 250m buffer zone) if the land is used for housing?</p>	<p>Resident</p>	<p>The Council has undertaken an assessment of all the sites that it was considering allocating for development with regards to their impact on the proposed MSAs (Mineral Safeguarding Areas – Site Assessments, Aug 2018). In respect of the SW Extension the report concluded that the resource would be too small to be worked for practical and economic reasons.</p>
<p>Warrington Waste Disposal relies on a waste transfer station in Halton. It will not be able to cope with additional waste from housing proposed in the PDO. It is stated that it will be exported to other authorities - which ones and where are they aware? What will happen to waste landfill in the future?</p>	<p>Residents, developers/agents</p>	<p>It is recognised that there is a need for Waste Transfer Station (WTS) to reduce the reliance on the existing transfer facility in the neighbouring borough of Halton. The Council are in the process of seeking to identify a site for a WTS from land within our own ownership. If a site cannot be found from this source(s) then the Council will look to identify a site from existing or proposed employment allocations. The extent of exports of the various waste streams to landfill is</p>
<p>A more detailed consideration and examination of the need to identify suitable sites to manage waste arising from the Borough is needed. Additionally, the</p>	<p>Residents, developers/agents</p>	

<p>strategic implications /duty to co-operate with other regulating bodies and the Greater Manchester Waste Disposal Authority is required in relation to the identification of sustainable waste sites in the wider region.</p>		<p>outlined in the Waste Arisings and Capacity Requirements Report (2017). However, the requirements for landfill capacity are not considered to be significant and the Council has liaised with other authorities under the DtC and all the authorities who receive elements of these waste streams have confirmed that the quantities can be easily catered for within the consented capacity of the recipient facilities.</p>
<p>The aims and objectives should include the use of recycled materials as surfacing materials for sustainable transport routes to further evidence Warrington's commitment to green materials.</p>	<p>Residents</p>	<p>Policy ENV1 of the Proposed Submission Version Local Plan promotes sustainable waste management in accordance with the Waste Hierarchy, which includes the recycling of construction, demolition and excavation waste. Policy DC6 of the Proposed Submission Version Local Plan promotes sustainable construction practices including the use of appropriate recycled and sustainable materials</p>
<p>The Sand &amp; Gravel and Coal MSAs map is incorrectly labelled (Should be Fig 11) in the PDO Document.</p>	<p>Resident</p>	<p>Comment noted.</p>
<p>The Council should make it clear what this policy on Minerals and Waste means for Warrington in plain English.</p>	<p>Residents</p>	<p>Since the PDO consultation, the findings of the Minerals Resource Study and Waste Needs Assessments have informed Policies ENV1 and ENV3 to ENV5 of the Proposed Submission Version Local Plan. The supporting text describes the policy in non-technical wording.</p>
<p>The council is underestimating the need for waste facilities and currently does not provide sufficient waste facilities in the south of Warrington.</p>	<p>Residents</p>	<p>The need for waste facilities has been assessed in the Council's Waste Arising's and Capacity Requirements Report (May, 2017), which assessed three different levels of growth and two different recycling levels. The Council's housing requirement is in line with the lowest level of growth that has been modelled. In addition, a review of the Council's Community</p>

		Recycling Centres has been undertaken and it is proposed to provide a new facility in the Garden Suburb to replace the existing facility in Stockton Heath and cater for future needs.
Sewage capacity needs to be considered. The Council is underestimating the amount of waste water created by the size of its proposed developments.	Residents	The Council have consulted with United Utilities regarding the capacity of the existing Waste Water Treatment Works infrastructure in the borough and its ability to cope with the planned levels of growth. Policies ENV1 and INF3 of the Proposed Submission Version Local Plan has been informed by be these discussions. As have the strategic site allocation Policies MD1 to MD4 and OS1 to OS9.
The area covered by the Local Plan contains potentially significant reserves of unworked coal along with other hydrocarbon resources that can make a positive contribution to the nation's energy supply and sustainable economic development of the area. It is therefore vital that the Local Plan recognises the guidance contained in Minerals PPG and the importance of unworked coal seams, oil and shale reservoirs establishing a vision for the area for the next 10 – 15 years.	Developers/agents	The proposed allocations have been informed by an assessment of the mineral reserves. Policy ENV5 of the Proposed Submission Version Local Plan provides a strategic approach to energy mineral related development. Any exploitation of reserves is subject to detailed criteria being satisfied to ensure any environmental impacts can be mitigated.

### Theme 39: Any other Issues

No of responses Part 1	22
No of responses Part 2	558
<b>Total</b>	<b>580</b>

#### Overview

The purpose of this theme was to capture any other concerns respondents had which hadn't been picked up elsewhere. This highlighted various important concerns ranging from the publication of consultation to addressing the needs of elderly people within the Local Plan. Respondents varied from residents and elected representatives to developers/agents and other stakeholders.

#### Key Issues

The issues highlighted varied greatly from information which respondents believed to be missing from the PDO document to comments and queries relating to the process of preparation of the Local Plan and the ability for further reviews in due course. Respondents also highlighted gaps in the evidence base which supported the PDO. In particular, there were concerns regarding the delivery of infrastructure and how details should be included in an Infrastructure Delivery Plan (IDP). Viability and affordable housing need were also raised as important issues which the Local Plan needs to address. Concerns were raised with how the Council undertook the consultation and whether it had properly engaged with neighbouring Councils.

#### Conclusion

Since the PDO consultation, the Council has carried out a significant amount of work in fully updating its evidence base. As a result the Proposed Submission Version Local Plan is based on the latest evidence to ensure that the needs of the Borough will be met over the plan period. A detailed IDP has also now been produced, along with a plan-wide Viability Assessment, and both demonstrate that the level of development proposed in the Proposed Submission Version Local Plan is viable and measures to ensure delivery have been thoroughly considered. The Council is confident that any gaps in evidence base at the PDO stage have now been fully addressed.

The Council recognises that there were a large number of concerns raised with how the PDO consultation was undertaken. The Council will take these concerns into account ahead of the next stage of consultation. More detailed specific comments on other matters are addressed below. The Council has also engaged extensively with neighbouring boroughs and other key consultees in preparing the Proposed Submission Version Local Plan in accordance with the Duty to Cooperate. Strategic issues are now identified in the Council's Draft Statement of Common Ground.

A summary of all issues under this theme and the Council's response to them are set out below in Table 39.

#### Table 39: Any Other Issues –Issues and Responses

Issue	Respondent Type	Council Response
Better publication of consultation and events.	Residents	The Council recognises that there were a large number of concerns raised with how the PDO consultation was undertaken. The Council will take these concerns into account ahead of the next stage of consultation. All residents in the Borough will be contacted about the Local Plan Consultation and events will be held at venues with increased capacity.
The Council has not consulted properly with neighbouring Councils on its proposals. Cross boundary issues and the emerging Plans of neighbouring Councils have not been taken into consideration.	Residents, Elected representative, Neighbouring Councils	The Council had met with all neighbouring Councils in preparing the Preferred Development Option. The Council has continued discussions with all neighbouring Councils in accordance with the Duty to Cooperate process. Strategic cross boundary issues have been identified in the Council's draft Statement of Common Ground. This includes a number of actions to demonstrate how strategic issues are being resolved.
No reference has been made to the role of renewable energy which will come to the forefront during the lifespan of the proposals.	Residents	This is fully dealt with in Policy ENV7 in the Proposed Submission Version Local Plan.
Once the final plan has been agreed will there be a printed timeline that will detail when each phase will take place? I feel that this should be an important part of the plan because if brownfield sites become available a few years down the line then the plan can then be modified to limit its' impact on existing green field areas.	Residents	The development trajectory sets out when the Council envisages that development will come forward in the existing urban area and in the main development areas. If there is a significant change in the availability of brownfield land which has not currently been accounted for, for example should the Fiddlers Ferry site become available, then a review of the Local Plan would be undertaken to allow for this and reconsidered the spatial strategy of the plan.
PDO does not mention looking at sites outside the borough to meet waste needs. Useful to understand how Warrington is seeking to deal with this.	Residents	The Council's approach to Waste Management is set out under Objective 6 and Policy ENV1 of the Proposed Submission Version Local Plan.
The next version of the Local Plan should seek to identify the necessary physical and	Residents, other stakeholders	The Proposed Submission Version Local Plan is accompanied by a full Infrastructure Delivery Plan which has



<p>social infrastructure needed to support growth, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan.</p>		<p>been informed by discussions across different Council departments and with external stakeholders in order to identify the necessary social and physical infrastructure needed to support the level of growth identified in the plan.</p>
<p>The Council officers have failed to carry out the necessary ecological, transport and air quality surveys that would have informed a robust and sustainable plan. No transport modelling has been carried, the infrastructure feasibility study results are still to be completed and published</p>	<p>Residents</p>	<p>The Council has now produced a full suite of evidence base documents in support of the Proposed Submission Version Local Plan. These documents have been made available with the draft plan.</p>
<p>I believe that funding should instead be put into addressing the social issues in the town, especially the north, and investing in the town centre to make it much more appealing and consistent in its redevelopment.</p>	<p>Residents</p>	<p>A key priority of the Proposed Submission Version Local Plan is to prioritise development and investment in existing the existing urban area. This underpins the plan’s spatial strategy and the Council recognises that this is essential before the release of Green Belt land. There is a particular focus on regenerating inner areas of Warrington and broadening the role of the Town Centre. The Council is also preparing the more detailed Central Area Masterplan which will focus on regenerating the borough’s more deprived communities.</p>
<p>Consideration of funding to farmers to support the contribution of farming to the economy and to flood mitigation.</p>	<p>Other stakeholders</p>	<p>Comments noted. It is not within the remit of the Local Plan process to identify/secure funding for farmers, though the Council will continue to support a range of rural businesses.</p>
<p>The Local Plan should include a proper description and assessment of the historic environment in the Borough and the contribution it makes to the area (NPPF, Paragraph 169).</p>	<p>Elected representatives, other stakeholders</p>	<p>The Borough’s historic assets have been considered in detail as part of the Proposed Submission Version Local Plan. In dialogue with Historic England, Heritage Impact Assessments (HIAs) have been prepared for each of the main development areas and the proposed allocations in the settlements. The Council is confident that the proposed levels of growth can be accommodated without having a detrimental impact on the Borough’s heritage assets.</p>

<p>PDO is currently light or absent on some key policy areas such as affordable housing need and retail planning policies. Lack of retail assessment and update has provided a gap in evidence on the potential impact on assumed redevelopment of key retail sites in town centre.</p>	<p>Developers/agents</p>	<p>The Proposed Submission Version Local Plan includes full detailed policies on housing need (Policy DEV2) and retail and leisure needs (Policy DEV5). Policy TC1 also seeks to enhance the role of the Town Centre to broaden its offer in terms of cultural and leisure facilities, amongst others.</p>
<p>Clarification needed in terms of viability study and additional evidence.</p>	<p>Developers/agents</p>	<p>A full plan wide Viability Assessment has now been produced in support of the Proposed Submission Version Local Plan, along with a full suite of evidence base documents. These are all available to view along with the Proposed Submission Version Local Plan.</p>
<p>One of the Local Plan support documents is an Equality Impact Assessment Report, which aims to identify various groups based on Age, Gender, Ethnicity etc and how they may be impacted.</p>	<p>Residents</p>	<p>A full EqIA has been carried out in support of the Proposed Submission Version Local Plan.</p>
<p>No mention of ultra-high speed broadband.</p>	<p>Residents</p>	<p>The Council will support proposals for enhanced telecommunications, as set out in Policy INF3.</p>
<p>There is no mention of planning for the elderly residents of Warrington.</p>	<p>Residents</p>	<p>The Proposed Submission Version Local Plan recognises the importance of Warrington's aging population and planning for this over the plan period. The Local Housing Needs Assessment (2019) also highlights this issue. Policy DEV2 addresses this issue.</p>

<p>Site Ref: R18/094 - Object to the allocation of the site. All of the land within the site is not available as it is in different ownership and the owners have not been consulted on its availability.</p>	<p>Resident</p>	<p>Comments noted. The Development Options and Site Assessment Technical Report outlines the spatial options and individual site assessment process. This site has not been taken forward for allocation.</p>
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