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WARRINGTON Borough Council

# Warrington Borough Council

# Local Plan Review

# Regulation 18 Consultation: Standard Response Form

# October 2016

## Contents

## 1: Contact Details (Compulsory)

Title: Dr

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## 2: Questions

### Question 1

**Do you have any comments to make about the Council's evidence base?**

### Question 2

**Do you consider the assessment of Housing Needs to be appropriate?**

### Question 3

**Do you consider the assessment of Employment Land Needs to be appropriate?**

### Question 4

**Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?**

### Question 5

**Do you consider the assessment of Land Supply to be appropriate?**

### Question 6

**Do you consider that Green Belt land will need to be released to deliver the identified growth?**

### Question 7

**Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?**

### Question 8

**Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?**

## Question 9

**Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?**

## Question 10

**Do you consider the Sustainability Appraisal Scoping Report to be appropriate?**

## Question 11

**Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?**

## Question 12

**Do you agree with the assessment of Local Plan Policies at Appendix 1?**

## Question 13

**Do you consider the proposed 20 year Local Plan period to be appropriate?**

## Question 14

**Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?**

## 3: Responses

## Question 1

No comment

## Question 2

No comment

## Question 3

No comment

## Question 4

No comment

## Question 5

No comment

## Question 6

No comment

## Question 7

No comment

## Question 8

No comment

## Question 9

No comment

## Question 10

The Cheshire Wildlife Trust would like to comment on the Draft Sustainability Appraisal Scoping Report for Warrington. Our comments below relate to the questions set out in section 6.2 of the SA report.

6.2.1

4) Are the number, focus and level of detail of the proposed objectives and sub-objectives appropriate and proportionate given the aims, geographical scope and likely influence of the Local Plan Core Strategy Review?

CWT would like to comment on the contextual review (sections 3.10.7, 3.10.14 and 3.10.15) information provided in the SA report.

3.10.7 According to the NPPF, Local Authorities should set out strategic approach to Green Infrastructure in their Local Plans, planning positively for the creation, protection, enhancement and management of biodiversity and green infrastructure.

This paragraph does not accurately reflect the NPPF paragraphs 114 and 117 as it lacks a strategic spatial strategy for networks of biodiversity i.e. it does not address the following:
• set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; (NPPF para 114)
• plan for biodiversity at a landscape-scale across local authority boundaries (NPPF para 117)

3.10.14 and 3.10.15There has been no further net gain of designated sites since 2014 because there is no system in place to review existing or new sites or to provide advice for further enhancement. This should be recognised as Warrington will have further land that meets the criteria for designation for its wildlife value. Without a process for identifying and designating new sites these important areas for biodiversity may be lost.

6) Do you have any specific comments on Appendix A - draft Site Appraisal Framework and the criteria proposed to assess the likely significant effects of allocating sites in the Local Plan Core
Strategy Review?
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 i.e. land that provides a function in maintaining ecological connectivity between core sites of biodiversity. This land may not necessarily have any current designation.
The distances given are arbitrary and do not reflect current good practice relating to assessment of potential ecological impacts. Each case must be considered on its own merits. In the United Kingdom, the government has international and national commitments on biodiversity that include halting the loss of biodiversity and reaching net

## Question 11

No comment

## Question 12

The current policies relating to biodiversity will require major alterations to reflect current good practice, legislation and national policy.

## Question 13

No comment

## Question 14

No comment