

Warrington Borough Council

**Updated Proposed Submission Version
Local Plan (2021)**

**RESPONDING TO REPRESENTATIONS
REPORT (Regulation 22c)**

April 2022

WARRINGTON BOROUGH COUNCIL LOCAL PLAN

RESPONDING TO REPRESENTATIONS REPORT

1 Introduction

- 1.1 This Report provides an overview of the consultation that has been undertaken at each stage of the review of the Warrington Local Plan. This includes an overview of the main issues raised in representations received during each consultation and how the Council has taken these into account in the Plan Making process.
- 1.2 The Council undertook a second Regulation 19 consultation on the Updated Proposed Submission Version Local Plan between September and November 2021. The Council received a total of 2,597 responses to the consultation containing a total of 6,922 representations. A schedule providing a summary of main issues raised in the representations received during this consultation and the Council's response to those issues is provided in Appendix 1 to this report.

2 Regulation 18: Part 1 – Scope and Contents Consultation

Consultation Process

- 2.1 The Council undertook a 6 week period of consultation on the scope of the Local Plan 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 Local Plan review.
- 2.2 The Council consulted in accordance with its Statement of Community Involvement (SCI), advertising the consultation in the Local Press, on its web site and notifying groups and individuals in its Local Plan consultation database. This included statutory consultees and prescribed bodies, other groups set out in the SCI and a wide range of stakeholders, including residents, parish councils, community groups, developers and landowners and representatives groups of 'hard to reach' communities.

Overview of Respondents and Representations

- 2.3 The Council received a total of 78 responses to the consultation. The majority were from developers and landowners although responses were also received from Parish Councils, local residents and other stakeholders.
- 2.4 In total the Council received over 150 submissions for its Local Plan 'Call for sites'. The vast majority of sites were located in the Green Belt. Of these, the predominate land use being promoted was residential, although there were significant employment and mixed use proposal sites.

Overview of Main Issues

2.5 *Scope of Plan Review:*

There was general support from consultation responses for the proposed scope of the Plan review. This included support for:

- maintaining the current Plan's priority of unlocking major development opportunities in the town centre and Inner Warrington whilst addressing existing congestion in the town;
- focussing the Plan Review on identifying land for homes, employment and ensuring the delivery of infrastructure;
- the proposed 20 year plan period and the need to safeguard land beyond the plan period;
- maintaining current detailed policies where they are up to date; and
- including Gypsies & Travellers and Mineral & Waste sites and policies within the Plan.

2.6 *Assessment of Development Needs:*

A number of developers considered that Warrington should be uplifting its jobs forecast higher to match historic rates of job growth in the borough. This would result in a further increase in the Council's housing need. Other representors, notably parish Councils and residents considered that the Council was planning for too much growth.

How the Representations were taken into account

2.7 Having further considered the proposed scope of the review in the context of consultation responses and the emerging evidence base, it became apparent that fundamental elements of the existing Plan - including the amount of development proposed, the plan period, the approach to Green Belt and the format of the Plan with a Core Strategy and separate Development Plan Documents – will change. The Council therefore concluded that rather than simply resulting in an alteration to the existing Plan, the Review will result in a new Local Plan, incorporating the elements of the existing Plan that remain up to date.

2.8 The majority of consultation comments did not necessitate any fundamental amendment to the Council's approach to assessing future housing and employment needs at that stage.

2.9 Given the decision to prepare a new Local Plan, the Council undertook a further Regulation 18 consultation having prepared a 'Preferred Development Option', taking into account the responses to the first Regulation 18 consultation.

3 Regulation 18 – Part 2, Preferred Development Option (PDO)

Consultation Process

- 3.1 Consultation on the Preferred Development Option (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 Council again notified groups and individuals in its Local Plan consultation database, including statutory consultees and prescribed bodies, other groups set out in the SCI and a wide range of stakeholders, including residents, parish councils, community groups, developers and landowners and representatives groups of 'hard to reach' communities. The consultation was also publicised in the 'Wire' – the Council's e-bulletin which was received by over 4,000 people.
- 3.2 Events were held across the Borough in ten different locations, comprising drop in sessions with staff on hand to answer questions and discuss the content of the PDO. The majority of sessions were held in the afternoon extending into the evening with one Saturday morning /afternoon event.
- 3.3 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.

Overview of Respondents and Representations

- 3.4 Around 4,500 responses were received to the Preferred Development Option consultation. These were all taken into account in the preparation of the Proposed Submission Version Local Plan 2019.
- 3.5 The vast majority of representations were made by Warrington residents and campaign groups, together with Parish Councils, MPs, Borough Councillors and community groups, concerned with the scale and location of development being proposed, in particular relating to the release of Green Belt. A petition was also submitted objecting to the proposals in the Preferred Development Option which was signed by over 4,000 people.
- 3.6 The Council also received a significant number of representations from developers and landowners actively promoting sites through the Local Plan process.

Overview of Main Issues

- 3.7 A comprehensive summary of the main issues that were raised during the Scope and Contents and Preferred Development Option consultations and the Council's response to those issues were reported to Cabinet in March 2019 and is available to view on the Council's web site. An overview of the main issues from the PDO consultation is provided below.

3.8 *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.

3.9 *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.

3.10 *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 the 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.

3.11 *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.

3.12 *Proposed distribution of new development:*

- A number of developers pushed 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 had undertaken options assessment prior to detailed transport modelling.

3.13 *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 questioned phasing of development with concern that it may unnecessarily hold development back.
- Developers promoting sites elsewhere questioned deliverability of infrastructure and stated that the assumed build rates are not achievable.

3.14 *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.

How the Representations were taken into account

- 3.15 Given the number and nature of representations made to the Preferred Development Option consultation, the Council carried out a fundamental review of the technical evidence base and options assessments that underpin the emerging Local Plan. This informed the Proposed Submission Version Local Plan (2019).
- 3.16 The Council updated its 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 National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) and addressed widespread public concern that the Council was using economic forecasting data that pre-dated the EU Referendum.
- 3.17 The Council 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. It carried out an assessment of all individual sites submitted by landowners and developers for consideration as part of the Local Plan process.
- 3.18 More detailed consideration was given to the development potential of the existing urban area. The Council reviewed its density assumptions to promote higher density residential development in the town centre and surrounding area. This work

acknowledged 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.

- 3.19 The Proposed Submission Version Local Plan (2019) was prepared at the same time as the new Local Transport Plan to ensure the transport implications are properly assessed and that the development proposed in the Proposed Submission Version Local Plan supports the Council's aim of promoting sustainable transport modes. This work included testing the transport implications of the emerging Local Plan through the Council's Multi-Modal Transport Model.
- 3.20 Detailed work was undertaken to demonstrate that the Plan can be delivered. This included assessing the deliverability of infrastructure required to support Warrington's growth, assessing the viability of development sites and planning policies and a review of build rates for new development.
- 3.21 The Council engaged with all neighbouring Boroughs under the 'Duty to Cooperate' process to identify cross boundary issues and agree how these can be resolved. These issues were set out in the draft Statement of Common Ground. The Council also engaged with infrastructure providers to ensure that they are able to plan and provide for the needs of new development and statutory consultees - including the Environment Agency, Natural England, Highways England and Historic England - to ensure the Plan addressed their specific concerns.
- 3.22 The Proposed Submission Version Local Plan's spatial strategy was similar to that proposed in the Preferred Development Option but was refined to take into account the response to consultation and the more detailed evidence base work.
- 3.23 The size and extent of the Garden Suburb was reduced to reflect the lower overall housing requirement and to address some of the concerns expressed during consultation. Detailed consideration was given to the rate that new homes can realistically be built. This meant that the Garden Suburb would not have been completed in full until after the end of the Plan period. The Allocation policy would have ensured that development is coordinated with the delivery of supporting infrastructure, that the Suburb is based on an extensive network of green space and that the separate identity of Appleton Thorn is maintained. It also required that the proposals for the Garden Suburb are developed in more detail through the preparation of a Development Framework, which the Council proposed to prepare as a Supplementary Planning Document.
- 3.24 The South West extension was reduced in size in order to ensure an appropriate green buffer between the allocation site and Moore Village in Halton. The Allocation policy confirmed that development could not come forward until the funding and the programme for the delivery of the Western Link had been confirmed.
- 3.25 Following a detailed site assessment process, the Proposed Submission Version Local Plan identified the sites proposed to be removed from the Green Belt and allocated

for residential development in the outlying settlements. In total these sites could provide a minimum of 1,085 homes.

- 3.26 With regard to Employment, the Council confirmed a realistic supply of 118 ha of employment land within the main urban area.
- 3.27 Through the Council's Duty to Co-operate discussions with neighbouring authorities, it was agreed in principle that a 30 hectare extension to the west of the established Omega employment development, located in the Borough of St Helens, would count towards Warrington's employment development needs, subject to ensuring appropriate mitigation of highways impacts.
- 3.28 The Council engaged with the Central Area Board, who were preparing the Central Area Masterplan, and groups preparing Neighbourhood Plans to consider how their plans and proposals relate to the emerging Local Plan.

4 Regulation 19 - PSVLP 2019

Consultation Process

- 4.1 The consultation on the PSVLP under regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 was held between April and June 2019. The consultation process was in accordance with the regulations and the Council's Statement of Community Involvement (SCI).
- 4.2 All residents and businesses in the Borough received a letter notifying them of the consultation. Emails and letters were also sent to those on the Council's Local Plan mailing list. This included statutory consultees, prescribed bodies and other groups identified in the Council's SCI, people who made representations at earlier stages of the Local Plan process and other individuals, groups and organisations who had asked to be updated on the Local Plan, including a number of organisations representing 'hard to reach' groups. A notice was placed in the Warrington Guardian on April 11th 2019 to publicise the consultation together with publicity on the Council's web site and on social media.
- 4.3 Six public consultation events were held between 8th May and the 8th June. Five of these events were held on weekdays from 2pm to 8pm at the Halliwell Jones stadium. A further event was held on a Saturday between 10am and 5pm at Parr Hall. Large venues were chosen to meet the demand after more localised venues at the previous round of Local Plan consultation struggled to accommodate the numbers attending.
- 4.4 Both the Halliwell Jones Stadium and Parr Hall are centrally located, with large car parks, are near train and bus interchanges and are fully accessible to all. The consultation was done jointly with the Local Transport Plan 4 consultation which brought out the links between the 2 documents. There were numerous display boards with Officers in attendance to answer questions and support the event, response forms were also available.

- 4.5 There were also a number of special events for ‘hard to reach’ groups. This included presentations to Warrington’s Disability Forum in April 2019; the IMPACT Warrington’s Youth Council in June 2019; and the Voluntary Action Network in April 2019.

Overview of Respondents and Representations

- 4.6 In total there were 3,185 responses to the consultation.
- 4.7 Over 90% of respondents were local residents together with local elected representatives and local groups and organisations. The overwhelming majority of these responses were concerned with the scale and location of development being proposed, in particular relating to the release of Green Belt land, and the impact of development on Warrington’s infrastructure.
- 4.8 The remainder of respondents included statutory consultees (including national bodies and neighbouring Councils); and developers and land owners actively promoting sites through the Local Plan process. Responses were also received from local businesses and visitors to the town.
- 4.9 The Council also received 2 petitions.
- a petition with 968 signatories against the allocation of the Peel Hall site; and
 - a petition with 189 signatories from Burtonwood residents which requested an extension to the consultation time limit due to them being unaware of the Draft Local Plan consultation.
- 4.10 A total of 142 late responses were received which were considered by the Council but were recorded as ‘late’.

Overview of Main Issues

- 4.11 A summary of the main issues from the consultation and the Council’s response to these issues were contained in the schedules provided as an Appendix to the September 2021 Cabinet Report.
- 4.12 The representations themselves were published on the Council’s web site in 2020. [Local Plan Review documents 1-250 | warrington.gov.uk](https://www.warrington.gov.uk/local-plan-review-documents-1-250)
- 4.13 The headline issues raised by different categories of respondents are set out below.
- 4.14 *Responses from public / parishes / elected representatives:*
- Concern that the Plan is resulting in the release of an excessive amount of Green Belt land due to housing and employment land requirements being overstated and with brownfield capacity being underestimated, particularly given the closure of Fiddlers Ferry Power Station.
 - Imbalance of Green Belt release between north and south Warrington.

- Widespread concern about the increase in traffic and impact on air quality.
- Concern that location of new homes does not reflect where the majority of existing and future employment opportunities are located, which will result in more commuting and congestion.
- Employment allocations are just to provide logistics facilities and will only provide low value jobs.
- Concern about impact on social infrastructure, in particular schools, GPs and Warrington Hospital.
- Concern over the environmental and ecological impacts of loss of countryside.
- Scepticism over whether new infrastructure required to support development will be delivered and if the funding gap in the Infrastructure Delivery Plan can be plugged.
- Concern that new development will not be affordable for local residents and will provide housing for people commuting into Manchester and Liverpool.
- Objections to the proposed Garden Suburb allocation with wide ranging concerns raised over loss of Green Belt; impacts on the natural and built environment; impacts on existing transport and social infrastructure; and concern that additional infrastructure required to support development will not be delivered.
- Objections to the South West Urban Extension and Waterfront (including Port Warrington) with wide ranging concerns raised over loss of Green Belt, the risk of Warrington merging with Halton; impacts on the natural environment, in particular concerns over the loss of Moore Nature Reserve; detrimental impact on the character of the existing area; and the increase of traffic and congestion.
- Objections to the Peel Hall allocation with concerns raised over loss of an extensive area of green open space and the traffic and associated air quality impacts of development.
- Range of objections to the sites within the outlying settlements relating to loss of Green Belt, highways impacts and impacts on local services, with by far the largest number of responses objecting to the proposed Burtonwood allocation.

4.15 *Responses from landowners and developers:*

- Concern that the Plan's housing and employment land requirements are too low.
- Economic projections are too conservative, particularly given Warrington's historically high levels of growth.
- Need for increased flexibility within land supply given risks associated with proposed large urban extensions.
- Brownfield capacity overestimated, particularly in the town centre.
- Need for safeguarding land beyond Plan period to ensure that revised Green Belt boundaries are capable of enduring over the long term.
- Comments on spatial strategy largely dependent on whether a respondent's land has been included within a proposed allocation, but a consistent theme is that additional allocations are required in the outlying settlements and on smaller sites around the main urban area to provide balance with the large urban extensions.
- Concern that the viability evidence underpinning the Plan is not sufficiently robust.

- Belief that increased flexibility is required within the Plan, in particular relating to provision of affordable housing, accessibility standards, self-build and custom housing and contributions towards infrastructure.

4.16 *Responses from neighbouring authorities and statutory consultees:*

- No significant issues raised by neighbouring authorities, although Cheshire West & Chester / Cheshire East requested further work be undertaken to understand the potential highways impacts of the Garden Suburb. Cheshire East also sought assurance in relation to the supply of minerals, given the amount of development proposed across the wider sub region.
- Highways England raised concerns with the Local Plan Transport Model Report and the level of information provided.
- Natural England requested greater detail relating to mitigation measures as part of the Habitats Regulation Assessment (HRA).
- Historic England requested additional detail in allocation policies to ensure appropriate mitigation of heritage assets and the strengthening of a number of policies where there is a heritage consideration, in line with the findings of WBC's Heritage Impact Assessments.
- United Utilities and National Grid requested a number of amendments to the Plan to ensure that the impacts of new development can be appropriately mitigated and that their infrastructure is protected.

How the Representations were taken into account

4.17 Having considered in detail the key issues raised from the 2019 consultation including representations on policies and allocations, and after having undertaken additional evidence base and options assessment work, the Council proposed a number of significant changes from the previous Proposed Submission Version Local Plan (2019).

4.18 These changes included:

- a reduction of the Plan's housing requirement;
- the allocation of the Fiddlers Ferry site for employment and housing, following closure of the power station in March 2020;
- the removal of some of the previous Green Belt allocation sites, including Port Warrington and the Business Hub, the South West Urban Extension, the Phipps Lane site in Burtonwood and the Massey Brook Lane site in Lymm; and
- the reduction in size of the South East Warrington Urban Extension (previously known as the Garden Suburb).

4.19 Given the scale of changes being proposed, the Council produced an updated Proposed Submission Version Local Plan (2021) and this was subject to a further round of Regulation 19 consultation.

5 Regulation 19 Updated PSVLP 2021

Consultation Process

- 5.1 The Council undertook a comprehensive programme of consultation on the Updated Proposed Submission Version Local Plan (2021) between October and November 2021.
- 5.2 The Council advertised the consultation in the local press, on the Council's web site and through social media. The Council notified all groups and individuals on its consultation database. This included statutory consultees, prescribed bodies and other groups identified in the Council's SCI, people who made representations at earlier stages of the Local Plan process and other individuals, groups and organisations who had asked to be updated on the Local Plan, including a number of organisations representing 'hard to reach' groups.
- 5.3 The Council held 5 public consultation events at Warrington Wolves' stadium, giving people the opportunity to discuss the Updated Proposed Submission Version Local Plan in detail with Officers. A single, central, accessible venue was again chosen to ensure that the Council could safely manage the number of people attending, particularly given the COVID-19 restrictions in force at the time.
- 5.4 The Council provided presentation material to Parish Councils across the borough to enable them to undertake their own events. The Council also published an on-line video explaining the key proposals within the Updated Proposed Submission Version Local Plan and how people could make representations.
- 5.5 The Council ensured additional notification was provided to engage hard to reach groups, and held separate consultation sessions with Warrington Youth Voice and the Warrington Ethnic Communities Association.

Overview of Respondents and Representations

- 5.6 The Council received a total of 2,597 responses to the consultation containing a total of 6,922 representations. This included one response signed by around 500 separate individuals.
- 5.7 The vast majority of responses have again been received from the public with similar issues raised by parishes and elected representatives. The number of responses have reduced compared to the 2019 consultation, reflecting the removal of a number of allocation sites that were previously proposed to be removed from the Green Belt.
- 5.8 A large number of responses has also been received from developers, including those whose sites are within the proposed allocations, those whose sites have been removed from the 2019 version of the Plan and those developers seeking to promote land elsewhere across the borough. Similar issues have been raised to the previous consultation, but the level and detail of objection has increased in response to the

Council's decision to reduce its housing requirement and remove a number of sites from the Plan

- 5.9 A total of 31 responses were received after the closing date of the consultation which have been reviewed by the Council but have been recorded as 'late'.

Overview of Main Issues

- 5.10 A summary of the main issues from the consultation and the Council's response to these issues are provided as an Appendix to this report. More detailed responses to technical issues raised in respect of the Council's Housing, Employment and Viability evidence are provided in Addendums to the Local Housing Needs Assessment (2021), the Economic Development Need Assessment (2021) and the Local Plan Viability Assessment (2021) respectively. The Addendums have been published on the Council's web site.
- 5.11 The representations themselves have been published on the Council's web site. [Planning policy | warrington.gov.uk](http://warrington.gov.uk/planning-policy)
- 5.12 The headline issues raised by different categories of respondents are set out below.
- 5.13 *Responses from public / parishes / elected representatives:*
- Concern that the Plan is resulting in the release of an excessive amount of Green Belt land due to housing and employment land requirements being overstated and with brownfield capacity being underestimated.
 - Objection to Green Belt being released at the outset of the Plan Period before all brownfield sites have been exhausted and given the Government is reviewing its housing methodology which means release of Green Belt land may not be required.
 - Imbalance of Green Belt release between north and south Warrington.
 - Widespread concern about the increase in traffic and impact on air quality.
 - Concern that location of new homes does not reflect where the majority of existing and future employment opportunities are located, which will result in more commuting and congestion.
 - Employment allocations are just to provide logistics facilities and will only provide low value jobs.
 - Concern about impact on social infrastructure, in particular schools, GPs and Warrington Hospital.
 - Concern over the environmental and ecological impacts of loss of countryside.
 - Scepticism over whether new infrastructure required to support development, including the Western Link, will be delivered and if the funding gap in the Infrastructure Delivery Plan can be plugged.
 - Concern that new homes will not be affordable for local residents and will provide housing for people commuting into Manchester and Liverpool.
 - Objections to the proposed South East Warrington Urban Extension allocation with wide ranging concerns raised over loss of Green Belt; impacts on the natural and built environment; impacts on existing transport and social infrastructure; and

concern that additional infrastructure required to support development will not be delivered.

- Objections to the loss of Green Belt land at Fiddlers Ferry for housing with a number of responses of the view that the brownfield part of the site should be developed for housing and not employment uses.
- Objections to the Peel Hall allocation with concerns raised over loss of an extensive area of green open space and the traffic and associated air quality impacts of development.
- Range of objections to the sites within the outlying settlements and the proposed Thelwall Heys allocation, with objections relating to loss of Green Belt, highways impacts and impacts on local services, in particular schools and health facilities.

5.14 *Responses from developers and landowners:*

- Concern that the Plan's housing requirement is too low and insufficient Green Belt land has been allocated to meet Warrington's housing needs:
 - Imbalance of housing requirement with employment land requirement.
 - Housing requirement will not meet Warrington's need for affordable housing.
 - Brownfield capacity overestimated, particularly in the town centre with viability issues meaning development will also deliver less affordable housing, not meet Warrington's needs for family housing and will make a lower contribution to required infrastructure.
 - Objection to proposed 'Stepped Housing Requirement' with need to allocate additional housing sites to ensure a 5 year land supply.
 - Need for 'safeguarded' land beyond Plan period to ensure that revised Green Belt boundaries are capable of enduring over the long term.
- Widespread concern that the Council is being overly optimistic in terms of the lead in times for development at Fiddlers Ferry - given the need to remediate the site and due to viability issues - and at the Waterfront allocation - given the reliance on the delivery of the Western Link.
- Comments on spatial strategy largely dependent on whether a respondent's land has been included within a proposed allocation, but a consistent theme is that additional allocations are required in the outlying settlements and on smaller sites around the main urban area to provide balance with the large urban extensions and increase Warrington's 5 year housing land supply.
- Significant objections from developers whose sites have been removed from the Plan at Port Warrington (including the associated business hub), South West Urban Extension and Burtonwood.
- Concern over delivery of Western Link given scale of required contribution from the Council and the removal of sites at Port Warrington and South West Urban Extension which could have made a significant financial contribution towards delivery.
- Developers promoting employment sites not allocated in the Plan consider that more employment land needs to be allocated in the Plan period as opposed to relying on land in St Helens at Omega west and on a future review of the Plan to meet longer term needs.

- 5.15 The Council has also engaged extensively with statutory consultees and neighbouring boroughs through the 'Duty to Cooperate'. As such, the Council has generally received positive consultation responses from statutory consultees including National Highways, English Heritage and the Environment Agency, whilst none of the Council's neighbouring authorities have raised any significant concerns with the Plan.
- 5.16 Natural England has requested greater detail relating to mitigation measures as part of the Habitats Regulation Assessment (HRA), whilst United Utilities and National Grid requested a number of amendments to the Plan to ensure that the impacts of new development can be appropriately mitigated and that their infrastructure is protected.

How the Representations were taken into account

- 5.17 The Council's response to each of the main issues raised during the consultation is provided in Appendix 1 to this report.
- 5.18 In responding to the key issues, the Council has undertaken additional evidence base work which is published on the Council's web site:
- An addendum to the Economic Development Needs Assessment (EDNA) to demonstrate a balance between the Council's employment land requirement and housing requirement, together with a response to technical submissions on the EDNA's methodology.
 - An addendum to the Local Housing Needs Assessment (LHNA) to demonstrate a balance between the Council's employment land requirement and housing requirement, together with a response to technical submissions on the LHNA methodology and clarification on the relationship between the Plan's overall housing requirement and meeting the need for affordable homes.
 - An addendum to the Local Plan Viability Assessment (LPVA) to consider viability in the context of the distribution of housing sites across the borough, additional evidence to demonstrate viability of town centre sites and a response to technical submissions on the LPVA's methodology.
 - An updated Strategic Housing Land Availability Assessment (SHLAA) to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery.
 - A consolidated Green Belt Report, combining all of the individual Green Belt assessments into a single report to assist participants of the Local Plan process, ahead of the Examination in Public.
- 5.19 Having reviewed the responses to the consultation and having undertaken the additional evidence base work, the Council is confident that the Plan, including the vision, housing and employment land requirements, spatial strategy, site allocations and detailed policies are robust. As such the Council is confident that the Plan provides the basis to sustainably meet Warrington's future development needs and meets the test of soundness as set out in the NPPF.

5.20 The Council has updated its draft Statement of Common Ground to ensure it has identified all relevant cross boundary strategic issues and to set out how the Council is working with its neighbours and statutory consultees to address these issues. The Council will seek to ensure all relevant bodies formally sign the Statement of Common Ground prior to submission.

APPENDIX 1 – RESPONSES TO KEY ISSUES FROM REPRESENTATIONS

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Residents	
<ul style="list-style-type: none"> • Object to Green Belt release which is against Government policy. Regeneration of brownfield land should be prioritised over Green Belt release. 	<ul style="list-style-type: none"> • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington’s development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA and EDNA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options. • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. The spatial strategy of the Plan forms part of the exceptional circumstances. 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.
<ul style="list-style-type: none"> • Plan is not positively prepared as the strategy does not meet the area’s assessed needs and is not consistent with sustainable development. 	<ul style="list-style-type: none"> • The Council is confident that the Plan will meet Warrington’s assessed development needs, including those for housing and employment land, in a manner that provides an appropriate balance between economic, social and environmental considerations. As such the Council considers that the Plan will contribute to the achievement of sustainable development in accordance with the definition and requirements set out in the NPPF.
<ul style="list-style-type: none"> • Amount of housing proposed is higher than necessary to accommodate predicted growth. Plan proposes a higher housing number than has ever been achieved before, despite recent projections from the Office for National Statistics suggesting a smaller population. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council has used the 2014 Based Household Projections to establish its minimum housing need figure in accordance with Government Planning Policy and associated Planning Practice Guidance.

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	<ul style="list-style-type: none"> • The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the proposed target in the previous 2019 PSVLP. • The Council acknowledges the recent relatively low level of housing completions. However, when considered over a 20 year period, Warrington’s average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council’s housing target was only 380 per annum up to 2014. The Council’s housing trajectory projects an increase in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will establish a housing land supply to support the Plan’s housing requirement over the Plan period as a whole.
<ul style="list-style-type: none"> • Government formula for housing figures may be unrealistic for Warrington. 	<ul style="list-style-type: none"> • The standard housing methodology defines the minimum housing need figure for a Council’s area. The updated PSVLP (2021) is proposing to meet this requirement but is no longer proposing an additional uplift, as was the case with the previous PSVLP 2019, based on revised estimates of jobs creation over the Plan Period. • The Council has demonstrated that the infrastructure required to support a housing target in line with the standard housing methodology is capable of being delivered and that areas of Green Belt can be released without compromising the overall function of Green Belt across the borough and the wider sub-region. It should be noted that all neighbouring boroughs have either released Green Belt in their adopted Plans or are currently preparing Plans which are proposing to do so. As such, in considering the Presumption in Favour of Sustainable

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	Development, as set out in paragraph 11 of the NPPF, the Council does not consider there are any strong reasons for restricting the overall scale of development in Warrington and setting a housing requirement below the minimum housing need figure.
<ul style="list-style-type: none"> • Fall in immigration not taken into account in growth projections. 	<ul style="list-style-type: none"> • The Council has used the 2014 Based Household Projections to establish its minimum housing need figure in accordance with Government Planning Policy and associated Planning Practice Guidance.
<ul style="list-style-type: none"> • There is no sound connection between aspirational growth and the spatial plan. Development needs resulting from the presumed levels of growth do not take account of development activity and opportunity in neighbouring authorities. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its needs, including housing, employment and infrastructure – including transport, education, health, leisure - over the plan period. This has then been considered in terms of spatial options with the Updated PSVLP 2021 considered the most sustainable way to meet the Borough’s needs. In assessing these needs, the Council has a Duty to Co-operate with neighbouring authorities to ensure Warrington’s plans are consistent with its neighbours and address strategic issues in a coordinated manner. This is evidenced within the Plan and its supporting documents.
<ul style="list-style-type: none"> • Plan assumes growth will be driven by housing rather than growing the economy, employment opportunities and supporting infrastructure - contrary to approach of other planning authorities. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the proposed target contained the previous PSVLP 2019. The Council considers that the alignment between housing provision and jobs growth is correct and this has been evidenced through the LHNA (2021) and EDNA (2021) which have been further supplemented by Consultation Responses/Rebuttal papers produced by GL Hearn and BE Group following the consultation on the UPSVLP in Autumn 2021.

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	<ul style="list-style-type: none"> • The Plan is underpinned by a detailed assessment of required supporting infrastructure and a Local Plan Viability Assessment to demonstrate deliverability. Policies within the Plan will ensure that supporting infrastructure is delivered in a timely manner relative to development coming forward.
<ul style="list-style-type: none"> • Plan proposes insufficient social infrastructure to support development. 	<ul style="list-style-type: none"> • The Local Planning Authority in determining additional social infrastructure requirements works with those agencies – both internal Council services and external partners - who are responsible for delivery of services and who have expertise in assessing future needs. This is reflected in the Plan (and in particular specific requirements are set out within site allocation policies) and the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support the new development proposed in the Plan.
<ul style="list-style-type: none"> • Residents have no confidence that necessary infrastructure will be delivered. The plan does not address the need for new infrastructure. Concern that the proposed increase in housing and lack of sufficient infrastructure will make Warrington inaccessible. 	<ul style="list-style-type: none"> • The need for new infrastructure has been assessed in detail with relevant Council and partner service providers. The Plan is underpinned by a detailed assessment of required supporting infrastructure and a Local Plan Viability Assessment to demonstrate deliverability. Policies within the Plan will ensure that supporting infrastructure is delivered in a timely manner relative to development coming forward.
<ul style="list-style-type: none"> • Infrastructure improvements need to be made prior to completion of residential developments. 	<ul style="list-style-type: none"> • Specific site allocation policies have provided detail as to when various elements of infrastructure are required to be delivered. Where evidence is clear that this must be before any development takes place, this has been specified in the relevant policy.
<ul style="list-style-type: none"> • The majority of new housing will not be affordable to local people, particularly in south Warrington given high house prices. 	<ul style="list-style-type: none"> • The Council considers that increasing the supply of housing is important to address issues of affordability in Warrington. • New housing development will also need to provide affordable housing. The Council will require 20% affordable housing in inner Warrington and 30% affordable housing in all other parts of the borough.

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	<ul style="list-style-type: none"> • The Council recognises there are particular issues of affordability in south Warrington. New development in south Warrington will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council's housing waiting list. A third will be for low cost home ownership, of which the majority will be 'First Homes' specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers. With regard to rents the Policy includes a safeguard that rents should not exceed the Local Housing Allowance rates.
<ul style="list-style-type: none"> • Concern that level of development in the plan will cause more frequent flooding. 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. Along with the requirements of Policy ENV2 Flood Risk & Water Management, it is considered that the risks associated with flooding have been adequately dealt with.
<ul style="list-style-type: none"> • The plan will have a negative impact on air quality. 	<ul style="list-style-type: none"> • A number of the Local Plan policies include specific provisions to reduce and mitigate the impacts of development on air quality. It is considered that one such policy, Policy INF1 contains a number of specific provisions to deliver sustainable transport solutions to tackle climate change whilst improving air quality. • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality

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	Action Plan, to ensure that opportunities to improve air quality are fully realised.
<ul style="list-style-type: none"> • Not enough focus on climate change and low carbon future. 	<ul style="list-style-type: none"> • In preparing the Plan, Climate Change formed a key consideration in the option assessment and sustainability appraisal process. The Plan's vision and Strategic Objectives include a commitment to reduce carbon emissions and tackle Climate Change. • A number of the Local Plan policies include specific provisions to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change. • Individual site allocation policies have a requirement to mitigate the impacts of climate change; be as energy efficient as possible and seek to meet a proportion of its energy needs from renewable or low carbon sources in accordance with Policy ENV7. • Policy ENV7 specifically relates to Renewable and Low Carbon Energy Development and sets out plan wide requirements in this regard.
<ul style="list-style-type: none"> • Equestrians should be considered in the Plan. 	<ul style="list-style-type: none"> • The need for multi-user routes is noted and site specific provision in relation to larger site allocations can be addressed post adoption of the plan when the detail is worked up through the preparation of development frameworks.
<ul style="list-style-type: none"> • Greater focus needed on town centre regeneration. The plan does not encourage economic growth in town centre. 	<ul style="list-style-type: none"> • The regeneration of the town centre is a key element of the Plan's spatial strategy. There is a specific objective in the Plan in respect of the town centre which has meant that town centre regeneration has been a key consideration in the options assessment process underpinning the Plan. The plan also contains a specific strategic policy to support the regeneration and growth of the town centre, whilst the Council has approved a Supplementary Planning Document in 2021 to provide more detailed planning guidance for development proposals coming forward in the town centre.

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<ul style="list-style-type: none"> • Employment opportunities from the Plan proposals are not aligned with the employment needs of the community. Plans for employment are only likely to offer low skilled/low paid jobs, encouraging a more transient population. 	<ul style="list-style-type: none"> • Warrington is home to a wide range of businesses. These range from major national and multi-national companies who have located their logistics operations at Omega, the cluster of Nuclear technology businesses (the largest in the UK) and offices at Birchwood Park (a designated Enterprise Zone), through to a diverse range of businesses located across Warrington's many industrial estates, with the Town Centre also being a focus for office development. • Whilst the largest employment allocations in the Plan make provision for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the Town Centre and Inner Warrington meeting the Borough's employment needs, as set out in full in the EDNA (2021). • The Council acknowledges that in some proposed employment areas, such as the South East Warrington Employment Area, the predominant uses will be warehousing and distribution and therefore there will be a relatively large number of lower skilled jobs. This emphasises the importance of providing a wide range of housing types across the borough as a whole and in south Warrington, including provision affordable housing, to ensure that employees have the opportunity to live in close proximity to their work.
<ul style="list-style-type: none"> • Green Belt residential developments will not provide affordable housing. 	<ul style="list-style-type: none"> • The Council's Local Plan Viability Assessment 2021 has demonstrated that 30% affordable housing is deliverable outside of inner Warrington and on all of the allocation sites proposed to be released from the Green Belt. The Council is therefore confident that it will secure affordable housing in line with its planning policy requirements.
<ul style="list-style-type: none"> • Object to the loss of agricultural land. 	<ul style="list-style-type: none"> • The quality of agricultural land was taken into account in the Council's spatial option and site assessment processes and in the Plan's Sustainability Appraisal. The Council has sought to minimise the loss of the best and most versatile agricultural land. The sites were assessed in detail against a consistent set of criteria relating to performance against

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	<p>the Plan’s objectives and SA/SEA site assessment criteria to establish that the sites were ‘suitable’. The agricultural quality of the land was just one the criteria that were used to assess the sites. Since the majority of the borough is covered by similar quality agricultural land this has little impact on the overall assessment of sites. The amount of land to be removed from the Green Belt (and hence the amount of BMVAL to be lost) has significantly reduced in the Updated PSVLP (2021) compared to the previous PSVLP (2019). It is now only proposed to remove 5% of land from the Green Belt compared to 11% previously. The vast amount of agricultural land in the borough will be retained.</p>
<ul style="list-style-type: none"> • Ecological and environmental impact of loss of Green Belt not properly assessed. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. This has also been assessed in detailed through the Sustainability Appraisal and Habitats Regulations Assessment. • The Council has ensured that the allocation policies include specific provision to protect ecology and provide a significant amount of green infrastructure. New development will be required to include extensive areas of open space, provide a net gain in biodiversity and provide compensatory Green Belt improvements.
<ul style="list-style-type: none"> • Plan creates employment opportunities in North Warrington and housing in South Warrington, increasing congestion and pollution and encouraging dependence on private vehicles. Indeed many residents will likely commute to work from outside of the Borough. 	<ul style="list-style-type: none"> • An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area, of which the majority will be located north of the Ship Canal, the Spatial Strategy is ensuring that a large number of new homes will benefit from being in proximity to established and newly developed employment locations. Through ensuring improvements to transport infrastructure, new and existing residents in south Warrington will be able to access these employment opportunities. With regard to new employment locations, the Fiddlers Ferry allocation will provide a wide

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	<p>range of jobs accessible to residents of north Warrington, with the new Western Link improving access for residents of south Warrington. The South East Warrington Employment Area will provide a major new employment site in south Warrington. This will again provide a range of jobs, but the Council acknowledges that the predominant uses will be warehousing and distribution and therefore there will be a relatively large number of lower skilled jobs. This emphasises the importance of providing a wide range of housing types across the borough as a whole and in south Warrington, including provision of 30% affordable housing, to ensure that employees have the opportunity to live in close proximity to their work. The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling.</p>
<ul style="list-style-type: none"> Does not take into account social impact of loss of Green Belt and potential impacts on health and wellbeing of residents. 	<ul style="list-style-type: none"> In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. Specific consideration has been given to Health and Wellbeing in the Suitability Appraisal. The Council has ensured that the allocation policies include specific provision for a significant amount of green infrastructure. New development will be required to include extensive areas of open space, provide a net gain in biodiversity and provide compensatory Green Belt improvements.
<ul style="list-style-type: none"> No strategy to manage adverse effects of increased LGV/HGV movements across the Borough. 	<ul style="list-style-type: none"> The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington MultiModal Transport Model. This includes consideration of LGV and HGV movements. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development, whilst reducing congestion and air

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	<p>pollution. The Local Plan will ensure the required infrastructure is delivered in a timely and coordinated manner.</p> <ul style="list-style-type: none"> • For example, The South East Warrington Employment Area policy requires additional infrastructure improvements required by the allocation policy to ensure that HGV traffic is able to efficiently access the motorway but is managed in relation to using residential areas as through-routes. As such, the Council is confident that HGV traffic will not have a detrimental impact on existing and future residential areas in south Warrington.
<ul style="list-style-type: none"> • The plan focuses services and amenities in North Warrington. 	<ul style="list-style-type: none"> • The Plan is underpinned by a detailed assessment of required supporting infrastructure and a Local Plan Viability Assessment to demonstrate deliverability. Policies within the Plan will ensure that supporting infrastructure is delivered in a timely manner relative to development coming forward. • Specific site allocation policies set out infrastructure requirements to support the level of development proposed. The Local Planning Authority in determining additional social infrastructure requirements works with those agencies – both internal Council services and external partners - who are responsible for delivery of services and who have expertise in assessing future needs. This is reflected in the plan (and in particular specific requirements are set out within site allocation policies) and the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support the new development proposed in the Plan. • As such the Council considers that services and amenities will be provided where they are required across the Borough as a whole in support of the spatial strategy of the Plan.
<ul style="list-style-type: none"> • A shorter term plan should be considered until the impacts of Covid-19 are fully understood. Limited evidence to suggest effects of Covid-19 and Brexit on future development patterns have been taken into account. 	<ul style="list-style-type: none"> • The Plan period is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption. The Government has confirmed that all Councils must have an up to date

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	Plan in place by 2023 and has instructed all Council to continue to progress their Local Plans.
<ul style="list-style-type: none"> • Plan contradicts WBC Health and Wellbeing Strategy. 	<ul style="list-style-type: none"> • The local planning authority has worked closely with other Council services to ensure that the plan addresses a broad range of strategies. The Council is confident that the objectives of the Health and Wellbeing Strategy have been incorporated.
<ul style="list-style-type: none"> • There is no evidence to suggest that all brownfield sites have been identified, and no evidence that the plan takes into account the land owned by WBC. 	<ul style="list-style-type: none"> • In preparing the Updated PSVLP 2021, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity, which was incorporated into the SHLAA. • Following consultation on the updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • Land owned by the Council has been taken into account on the same basis as any other land in the Borough, the availability of the site for future development being a key consideration.
<ul style="list-style-type: none"> • More clarity required on crossings over the Ship Canal and Bridgewater Canal as key pinch points effecting the Borough. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. This is identified in Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.

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	<ul style="list-style-type: none"> • Whilst specific details of a connection across the Bridgewater Canal and/or Ship Canal have not yet been identified, Policy MD2 requires that contributions are made towards this so that it can be utilised when the Council is in a position to take this forward. This position will continue to be monitored.
<ul style="list-style-type: none"> • Plan disproportionately impacts South Warrington. 	<ul style="list-style-type: none"> • The majority of new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal. • The Council acknowledges that there is a significant amount of Green Belt release proposed in South Warrington. The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. • It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP 2021 compared to the 2019 PSVLP.
<ul style="list-style-type: none"> • Council investment borrowings should be recovered for use in regeneration of the town centre and brownfield land. 	<ul style="list-style-type: none"> • The Council is undertaking a range of proactive measures to facilitate regeneration of the town centre and brownfield land.
<ul style="list-style-type: none"> • Plan shows a lack of understanding of the local road network and the existing congestion issues. 	<ul style="list-style-type: none"> • The Plan has been informed by both the Local Transport Plan (LTP4) and Warrington Multimodal Transport Model to assess the capacity of the road network with regard to the level of development proposed and to identify where improvements will be required through developer contributions and other investment over the plan period.
<ul style="list-style-type: none"> • The plan must ensure developers deliver affordable housing. Developers must also respect the need for community infrastructure/facilities, the delivery of which should be incorporated as conditions of planning permission. 	<ul style="list-style-type: none"> • The Council is confident that the Plan requires developers to fully mitigate the impact of development and contribute to affordable housing provision. Indeed this has been considered through the Local Plan Viability Assessment and the Council is confident that delivery of these important parts of the Plan is viable.

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<ul style="list-style-type: none"> • WBC's Development Plan for Housing and Infrastructure needs to be urgently updated; working according to a 2014 plan is unsatisfactory. 	<ul style="list-style-type: none"> • Comments noted. The Council is currently in the process of updating the Local Plan.
<ul style="list-style-type: none"> • Limited detail on new recycling facilities. Local Development Plan requires additional information on waste infrastructure. 	<ul style="list-style-type: none"> • The Council commissioned a Waste Needs Assessment (Waste Arisings and Capacity Requirements Report, Urban Vision 2017) as part of its Local Plan Review, which provides estimates of the amount of waste likely to be generated in the Borough over the plan period; reviews the capacity of existing and planned waste treatment facilities; confirmed cross boundary movements of waste; and provided an estimate of future gaps in waste management capacity. Policy ENV1 has been informed by these findings and sets out a clear approach and gives guidance on how development should respond to waste issues across the Borough.
<ul style="list-style-type: none"> • Plan is driven by commercial interests, not by the interests of residents and the local community. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its needs, including housing, employment and infrastructure – including transport, education, health, leisure - over the plan period. The Council must be able to demonstrate that the Plan is appropriate for the needs of the Borough and this will be assessed through the forthcoming Examination in Public.
<ul style="list-style-type: none"> • Plan does not promote sustainable development. 	<ul style="list-style-type: none"> • The Council is confident that the Plan will meet Warrington's assessed development needs, including those for housing and employment land, in a manner that provides an appropriate balance between economic, social and environmental considerations. As such the Council considers that the Plan will contribute to the achievement of sustainable development in accordance with the definition and requirements set out in the NPPF. • An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area the Spatial Strategy is ensuring that a large number of new homes will benefit from being in proximity to established and newly developed

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	employment locations, as well as other services and facilities that are essential to the creation of sustainable communities.
<ul style="list-style-type: none"> • The Western Link road is not needed now Port Warrington and the Walton expansion have been removed. 	<ul style="list-style-type: none"> • The Council remains committed to the development of the Western Link and following the completion of outline design works has submitted a planning application for the scheme. Validation of this application is currently awaited as the Council is currently carrying out a Gateway Review with various parties, prior to progressing the full, detailed business case for submission to the Department of Transport. • Part of the reason why Port Warrington and the South West Urban Extension were not included in the Updated PSVLP was because of concerns about the impact of traffic generated from these developments on the Western Link.
<ul style="list-style-type: none"> • No logic in withdrawing the South West Urban Extension allocation as the area has better infrastructure than the South East Warrington Urban Extension. 	<ul style="list-style-type: none"> • In carrying out its spatial options assessment the Council has concluded that the SEWUE allocation forms part of the most sustainable option for meeting Warrington's needs over the plan period. The full Options Assessment Technical Report and Sustainability Appraisal is available to view within the Plan's supporting evidence base.
<ul style="list-style-type: none"> • Plan proposals are not achievable in the plan period. 	<ul style="list-style-type: none"> • The Council considers that the proposals in the plan are ambitious but achievable. In relation to housing delivery, the Council acknowledges the recent relatively low level of housing completions. However, when considered over a 20 year period, Warrington's average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council's housing target was only 380 per annum up to 2014. The Council's housing trajectory projects an increase in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will establish a housing land supply to support the Plan's housing requirement over the Plan period as a whole.

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	<ul style="list-style-type: none"> • The Council's EDNA 2021 demonstrates the strong demand for employment land in Warrington and the Council is confident the Plan's employment allocations will be delivered within the Plan Period. • The need for new infrastructure has been assessed in detail with relevant Council and partner service providers. The Plan is underpinned by a detailed assessment of required supporting infrastructure and a Local Plan Viability Assessment to demonstrate deliverability. Policies within the Plan will ensure that supporting infrastructure is delivered in a timely manner relative to development coming forward.
<ul style="list-style-type: none"> • Greater focus needed on accessibility for wheelchair users across the borough. 	<ul style="list-style-type: none"> • A key aim of the UPSVLP 2021 is to create places that are inclusive and accessible to all as detailed in Policy DC6. The UPSVLP 2021 also requires all new homes to be 'accessible and adaptable' (to Building Regulation Standard M4(2)) and 10% of new homes to be 'wheelchair user dwellings' (Building Regulation Standard M4(3)) – See Policy DEV2.
<ul style="list-style-type: none"> • The Council should calculate the carbon footprint of the plan and make this available to the public. 	<ul style="list-style-type: none"> • Whilst the Council is unable to calculate the specific carbon footprint of the Plan, addressing and mitigating the impacts of climate change is an important priority of the UPSVLP and is an ongoing theme with references and policy requirements throughout the document.
<ul style="list-style-type: none"> • Questions whether Green Belt release for residential developments is based on gaining city status. 	<ul style="list-style-type: none"> • The amount of Green Belt release proposed in the UPSVLP has been determined by the Borough's needs over the plan period, the capacity for development within the existing urban area and the need to amend Green Belt in a robust way ensuring longevity to the revised boundaries.
<ul style="list-style-type: none"> • There is no exceptional circumstances for the proposed employment site on Green Belt land and the proposal is not backed up by any meaningful economic strategy. 	<ul style="list-style-type: none"> • The release of Green Belt land is necessary to meet the employment land needs of Warrington over the plan period up to 2038. The Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites.

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<ul style="list-style-type: none"> Plan continues to perpetuate the rationale of past New Town planning and, therefore, does not align with NPPF policies stating that plans should 'be prepared positively, in a way that is aspirational but deliverable '. 	<ul style="list-style-type: none"> The Council considers that the plan is in alignment with the requirements of the NPPF and associated planning guidance. Whilst the SEWUE includes land which was a legacy of the New Town Commission (now within the ownership of Homes England), a detailed options assessment has been carried out to determine the spatial strategy of the plan. The Council is confident that the UPSVLP 2021 identifies the most appropriate development for Warrington over the plan period. It has been prepared positively and is aspirational yet deliverable.
<ul style="list-style-type: none"> The Council has employed at significant cost a number of high powered consultancies to help it fulfil its obligations in developing its various plans and support documents. Therefore, the plans and support documents are by necessity written with a bias to reflect the desires of the Council and various stakeholders. 	<ul style="list-style-type: none"> The Council has undertaken a comprehensive review of its needs, including housing, employment and infrastructure – including transport, education, health, leisure - over the plan period. The Council must be able to demonstrate that the Plan is appropriate for the needs of the Borough and this will be assessed through the forthcoming Examination in Public.
<ul style="list-style-type: none"> Concern for hedgehog conservation. 	<ul style="list-style-type: none"> Comments noted. Ecology is a key consideration throughout the plan, with specific policy requirements to protect habitats and ensure net biodiversity gain.
<ul style="list-style-type: none"> The diagrams appear deliberately vague to be able to simply associate where the building work is planned. 	<ul style="list-style-type: none"> Some of the plans and diagrams are broad concept plans to show how areas may be developed and these are not intended to be definitive at this stage. All allocations are however specifically identified with definitive boundaries on the Policies Map which accompanies the Pplan. This is available in PDF format but also as a layer on the Council's interactive mapping facility on the website.
<ul style="list-style-type: none"> WBC need to consider empty town centre properties. 	<ul style="list-style-type: none"> Empty properties in the town centre have been considered in terms of Town Centre capacity and regeneration potential.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> Support for the retention of Green Belt around Moore village. Also the Plan gives support to issues of climate change, and supports the retention of local agricultural land. 	<ul style="list-style-type: none"> Support noted.

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<ul style="list-style-type: none"> • Question the delivery of required infrastructure associated with proposed development and the fact that developers can put forward viability arguments to reduce S106 payments. 	<ul style="list-style-type: none"> • The need for new infrastructure has been assessed in detail with service providers. The Plan is underpinned by a detailed assessment of required supporting infrastructure and a Local Plan Viability Assessment to demonstrate deliverability. Policies within the Plan will ensure that supporting infrastructure is delivered in a timely manner relative to development coming forward. • Where developers are seeking to reduce S106 contributions on the grounds of viability, this will require them to present an open book assessment for review by the Council. In some cases development may not be financially viable, for example where there are site specific issues of land contamination that require extensive remediation – in such areas the Council must be realistic as to what the development can deliver whilst also ensuring that investment and development in these locations is not unduly restricted.
<ul style="list-style-type: none"> • Strongly object to the proposals put forward in the whole plan. 	<ul style="list-style-type: none"> • The Council considers that the UPSVLP 2021 presents the most appropriate means of meeting the Borough’s needs over the plan period. This is supported by the evidence which accompanies the plan. This position will be tested by an independent planning inspector at the forthcoming Examination in Public.
<ul style="list-style-type: none"> • No justification for the scale of homes proposed and for employment allocations in South Warrington. 	<ul style="list-style-type: none"> • The majority of development in the Plan period will be within the main urban area of Warrington, of which the majority will be north of the Ship Canal. • The Council acknowledges that there is a significant amount of Green Belt release proposed in South Warrington. The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington’s development needs as part of the Plan’s overall Spatial Strategy whilst ensuring the long term integrity of Warrington’s Green Belt.

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	<ul style="list-style-type: none"> • It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP compared to the 2019 PSVLP.
<ul style="list-style-type: none"> • The Plan is inconsistent with national policy. There is no sound or logical connection between aspirational growth and the spatial plan. 	<ul style="list-style-type: none"> • The Council considers that the Plan is in alignment with the requirements of the NPPF and associated planning guidance. A detailed assessment of the Borough's needs over the plan period has been carried out along with options assessment process to determine the spatial strategy of the plan. The Council is confident that the Updated PSVLP 2021 identifies the most appropriate development for Warrington over the plan period. It has been prepared positively and is aspirational yet deliverable.
<ul style="list-style-type: none"> • The plan does not take into account development activity in neighbouring authorities. 	<ul style="list-style-type: none"> • The Council has a Duty to Co-operate with neighbouring authorities to ensure Warrington's plans are consistent with its neighbours and address strategic issues in a coordinated manner. This is evidenced within the Plan and its supporting documents.
<ul style="list-style-type: none"> • No justification for the predicted housing growth and therefore the volume of allocations is not justified. 	<ul style="list-style-type: none"> • The Council has established its housing requirement based on a comprehensive assessment of future development needs and in accordance with the standard methodology set out in Government Planning Policy and associated Planning Practice Guidance.
<ul style="list-style-type: none"> • The plan should focus on the re-use of brownfield land. 	<ul style="list-style-type: none"> • A key objective of the Plan is to maximise the development of brownfield sites and promote regeneration of the town centre and inner Warrington. The majority of development in the Plan period will be within the main urban area of Warrington. • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington's development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options.
<ul style="list-style-type: none"> • Lack of a plan to reduce congestion in South Warrington and increased traffic from allocations will make queues and air quality worse. 	<ul style="list-style-type: none"> • Proposed site allocations in South Warrington have been tested through Warrington Multimodal Transport Model and infrastructure

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	<p>improvements have been identified where necessary. These requirements have then been included in individual allocation policies, with the phasing of development controlled to ensure these improvements are delivered in a timely manner.</p> <ul style="list-style-type: none"> • In addition, the allocation policies for the South East Warrington Urban Extension and South East Warrington Employment Area in the Updated PSVLP (2021) include a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area.
<ul style="list-style-type: none"> • The draft plan perpetuates a dated New Town rationale of town planning. 	<ul style="list-style-type: none"> • The Council considers that the plan is in alignment with the requirements of the NPPF and associated planning guidance. Whilst the SEWUE includes land which was a legacy of the New Town Commission (now within the ownership of Homes England), a detailed options assessment has been carried out to determine the spatial strategy of the plan. The Council is confident that the Updated PSVLP 2021 identifies the most appropriate development for Warrington over the plan period. It has been prepared positively and is aspirational yet deliverable.
<ul style="list-style-type: none"> • Acknowledgement of changes made in the Updated PSVLP 2021 following the previous consultation. Including reducing Green Belt release and housing numbers. 	<ul style="list-style-type: none"> • Comments noted.
Landowner/Developer	
<ul style="list-style-type: none"> • There remain outstanding responses from various neighbouring authorities: St Helens regarding Omega West, Halton regarding Fiddlers Ferry allocation, Cheshire East on the SEWUE allocation, St Helens regarding Parkside and Bold Garden Suburb. Therefore the legal requirements of the DtC have not been met. 	<ul style="list-style-type: none"> • Dialogue with neighbouring authorities continues to be ongoing and the Council is confident that it has fully met its Duty to Cooperate. The Statement of Common Ground and Duty to Co-operate Statement have been updated accordingly and will be kept under review.
<ul style="list-style-type: none"> • The revised plan fails to comply with the DtC on the grounds that no assessment or understanding has been presented which deals with the likely imbalances of jobs and homes within the borough as a result of the Council's strategic economic growth plans and delivery of housing only to 	<ul style="list-style-type: none"> • The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the

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<p>meet demographic need. The UPSVLP 2021 is therefore not legally compliant.</p>	<p>Borough's Green Belt compared to the previous proposed target. The Council considers that the alignment between housing provision and jobs growth is correct and this has been evidenced through the LHNA (2021) and EDNA (2021) which have been further supplemented by Consultation Responses/Rebuttal papers produced by GL Hearn and BE Group following the consultation on the UPSVLP in Autumn 2021.</p>
<ul style="list-style-type: none"> • The draft plan does not address the need for Motorway Service Areas (MSA), and is not consistent with the provisions of the 2021 Framework or Regulations. This need should be explicitly addressed through the duty to co-operate. 	<ul style="list-style-type: none"> • There is no specific requirement for the Local Plan to make provision for a Motorway Service Area. National Highways have confirmed they do not have responsibility for meeting the need for Motorway Service Areas and this is not an issue they would expect to be addressed through Duty to Co-operate discussions.
<ul style="list-style-type: none"> • Plan does not reflect national planning policy, including the approach towards safeguarded land for long term development and the approach towards housing allocations in the outlying settlements. 	<ul style="list-style-type: none"> • The Council considers that the plan is fully in line with NPPF in requiring land for longer term development. • 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. The Council also notes that the rate of increase in households is projected to decrease over the last 10 year period of the Plan. Given the rate of job growth is also forecast to decrease over time, the Council considers there will not be a requirement for any uplift in housing numbers to provide a balance with future jobs growth. In terms of land supply, the Local Plan is already providing for around 2,000 additional homes through the flexibility factor in its land requirement calculation. The proposed South East Warrington Urban Extension allocation in the draft Local Plan will provide for around 1,800 homes beyond the Plan period and Fiddlers Ferry will provide around 450 homes. The Council acknowledges that the availability of brownfield development sites is likely to decrease over time. Nevertheless, given likely advances in technology and development trends over the next 20 years, the Council considers it is likely there will be additional major

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	<p>brownfield development sites that will come forward beyond the Plan Period but cannot be accounted for at present. The Council therefore considers that there will be sufficient supply to meet the level of housing need for at least 12 years following the end of the Plan period. The Council is therefore confident that there is no need for any safeguarding of land to meet future residential need and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period.</p> <ul style="list-style-type: none"> • The Council considers that it has given detailed consideration to the growth potential of the outlying settlements through the options assessment process. The level of development proposed in the outlying settlements is considered to be appropriate in the context of the Plan's overall spatial strategy. The level of development can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements and will not change the character of the respective settlements. Further allocations in the outlying settlements are not considered necessary to meet the Plan's housing requirement and could have infrastructure and character impacts
<ul style="list-style-type: none"> • The site selection process is flawed. The site selection process has been out sourced to consultants with little knowledge of the area. 	<ul style="list-style-type: none"> • The Council is confident that the site selection process and options assessment has been carried out appropriately and this is evidenced in the detailed evidence base which accompanies the Plan.
<ul style="list-style-type: none"> • Support for the overall vision and objectives but is concerned that the strategic policies of the plan will not enable its delivery. 	<ul style="list-style-type: none"> • All development options considered in preparing the Plan have been assessed against the Plan's Objectives which are derived from the Vision. The Council is therefore confident the development proposals and policies in the Plan are consistent with the Vision and will contribute to its delivery.
<ul style="list-style-type: none"> • The UPSVLP fails to meet the requirements of the NPPF for strategic policies to cover at least a 15 year period from adoption and in instances where larger scale developments form part of the strategy, for policies to be set within a vision that looks further ahead (at least 30 years). 	<ul style="list-style-type: none"> • The Council considers that the Plan is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption. The Plan's vision looks forward for at least the next 30 years. In particular the larger allocation sites such as Fiddlers Ferry and

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	the South East Urban Extension have capacity to deliver development beyond the plan period. This not only allows for policies to be set within a broader context but also ensures that revised Green Belt boundaries are robust and endure well into the future.
<ul style="list-style-type: none"> • The Council’s own housing evidence, the Local Housing Needs Assessment Update, GL Hearn (2021) and the Local Plan (PSVLP2) itself have different timeframes. This error is indicative of the extent to which the Local Plan and its own evidence base are fundamentally flawed, unjustified and unsound as a result. 	<ul style="list-style-type: none"> • The Council is confident that the LHNA (2021) covers the correct plan period which is 2021-2038 inclusive. In some cases mid-year data has been used and it is therefore recognised that this may have caused some confusion, however the data used is considered to be robust.
<ul style="list-style-type: none"> • Plan does not take into consideration outside factors such as certain land plots within Green Belt that adjoins settlements. 	<ul style="list-style-type: none"> • In drafting the plan the Council has undertaken a comprehensive review of all sites put forward by landowners through the ‘call for sites’ exercise. A site selection and assessment process has then been carried out, as detailed in the Site Assessment Technical Paper and accompanying evidence base documents. This information has informed the Spatial Strategy which underpins the Updated PSVLP 2021.
<ul style="list-style-type: none"> • The removal of Burtonwood, Mersey Brook Lane and the South West Urban Extension as housing land allocations is noted and considered acceptable. 	<ul style="list-style-type: none"> • Comments noted.
<ul style="list-style-type: none"> • The ‘front loading’ of community infrastructure such as health care, schools, highways and parkland is strongly supported. This will enable smaller landowners and developers to bring forward windfall sites to further support the provision of housing in the borough. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Draft Local Plan is unsound as it fails to address housing need over the Plan period by failing to take a positive and aspirational approach to the housing requirement, failing to make sufficient housing provision to allow for job growth; failing to make adequate provision to allow a sufficient number of affordable homes to be delivered; adopting an inappropriate ‘stepped’ approach to housing delivery; it fails to significantly boost the supply of housing; and It fails to identify a sufficient supply and mix of housing sites. 	<ul style="list-style-type: none"> • The Council considers that the plan is in alignment with the requirements of the NPPF and associated planning guidance. A detailed assessment of the Borough’s needs over the plan period has been carried out along with options assessment process to determine the spatial strategy of the plan. The Council is confident that the Updated PSVLP 2021 identifies the most appropriate development for Warrington over the plan period. It has been prepared positively and is aspirational yet deliverable.

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	<ul style="list-style-type: none"> • The Council considers that the alignment between housing provision and jobs growth is correct and this has been evidenced through the LHNA (2021) and EDNA (2021) which have been further supplemented by Consultation Responses/Rebuttal papers produced by GL Hearn and BE Group following the consultation on the UPSVLP in autumn 2021. • The level of affordable housing proposed (and set out in Policy DEV2) has been informed by the Local Housing Needs Assessment (2021) which assesses in detail affordable housing need across the borough. This is also considered in the context of the Local Plan Viability Assessment which assesses whether the level of affordable housing proposed is viable and deliverable in different areas. On the basis of the evidence within the above documents, the Council is confident that the level of affordable housing proposed is appropriate to address the need identified over the plan period. • The Plan proposes a stepped trajectory as it is recognised that the Main Development Areas will have relatively long lead in times. This is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The Spatial Strategy already ensures additional small and medium sizes sites will come forward from the proposed Green Belt release in the outlying settlements and at Thelwall Heys early in the Plan Period in addition to the continued provision from existing sources in the wider urban area. The Council recognises a degree of risk associated with a large proportion of development being proposed within the Main Development Areas. This is reflected in the benchmark flexibility factor in the land supply of 10%.- roughly equivalent to the size of one of the large allocation sites– and the inclusion in the Plan of a review mechanism should housing land supply not be delivered in accordance with the planned trajectory. As such the Council does not considered there is any need to identify ‘reserve’ sites.

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	<ul style="list-style-type: none"> The Council is confident that the draft plan is aspirational but realistic in seeking to significantly boost the supply of housing by providing a sufficient supply of housing sites and encouraging a mix of dwellings as identified in Policy DEV2.
<ul style="list-style-type: none"> Welcome the reduction to the proposed release of Greenbelt and not in favour of unnecessary release if target assessments can be achieved by other means. 	<ul style="list-style-type: none"> Comments noted.
<ul style="list-style-type: none"> Landowner promoting land at Three Acres Farm, Glazebury for Green Belt release considers it should be designated through the Local Plan Review for housing to support the Glazebury community and growth which at the present time has very limited affordable housing. The site makes a weak contribution to Green Belt purposes in the Council's Green Belt Assessment (2016), is in single ownership, is available for residential development and other than its Green Belt designation is not subject to any other constraints. Glazebury does not have an allocation in the Local Plan, however, all settlements can play a role in delivering sustainable development in rural areas and an allocation here will safeguard the vitality and vibrance of the settlement. Three Acres Farm is situated on the boundary of Warrington/Leigh in a highly sustainable location within walking distance to many facilities and schools. Many local amenities are situated within a short walk of the site and would provide a day to day services and facilities for the new residents of the site. 	<ul style="list-style-type: none"> No sites were identified for Glazebury given there were no sites that were not strongly performing in Green Belt terms which performed sufficiently well against the assessment criteria. This site was considered as part of the Local Plan process but is not adjacent to the settlement boundary and is considered too far removed from the local centre of Glazebury.
Statutory Consultees	
<ul style="list-style-type: none"> United Utilities wishes to highlight its concerns on sites for development in multi-ownership, sustainable development can be compromised by lack of cooperation across allocations by developers/owners. 	<ul style="list-style-type: none"> Comments noted. The Council is confident that where sites are in multiple ownership land owners have demonstrated a commitment to work together to ensure delivery.
<ul style="list-style-type: none"> Natural England - Biodiversity Net Gain (BNG) is well referenced throughout Warrington Local Plan but consider more could be done to prepare for mandatory net gain in line with the Environment Act. 	<ul style="list-style-type: none"> Comments noted. The Council considers that it has included sufficient detail in the Plan to prepare for the mandatory net gain in line with the

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	Environment Act. It has also ensured it has taken this requirement into account in its Local Plan Viability Assessment.
<ul style="list-style-type: none"> • The Coal Authority - With national policy for a low-carbon future in mind, in January 2021 it was agreed corporately that although we will continue to provide the GIS surface coal data to authorities, all decision making regarding the safeguarding of surface coal will lie with the responsible authority. We will therefore no longer be requiring authorities with responsibilities for minerals to specifically include surface coal resource within Mineral Safeguarding Areas. 	<ul style="list-style-type: none"> • Comments noted.
<ul style="list-style-type: none"> • Considerable levels of growth proposed will lead to an increase in demand for Cheshire Constabulary services and infrastructure. However, as drafted, the UPSVLP does not ensure that future developments effectively mitigate their associated impacts nor address the additional burdens they will undoubtedly place on the Police. 	<ul style="list-style-type: none"> • Comments noted. The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of the Plan.
<ul style="list-style-type: none"> • NHS Warrington CCG is confident that the provision of new and expanded primary care facilities can be made in a timely manner to support the level and location of proposed development. 	<ul style="list-style-type: none"> • Comments noted.
<ul style="list-style-type: none"> • Warrington NHS Trust applauds the vision and ambitions set out in the Plan as access to both skilled and unskilled workers drawn from local and wider communities is critical for the sustainability of our organisation. Pleased to see the health needs of the Borough identified as a golden thread which runs throughout the proposed submission. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • GMCA Minerals & Waste Unit: Welcome the references to cross-working with regard to minerals and waste and inclusion of the latest data to underpin your comprehensive policies on these topics. Noting the reference to compliance to Duty to Cooperate for waste and that MPAs have cooperated as a single-sub region for aggregates supply, it may also be worth confirming the commitment going forward to highlight the importance of ongoing cooperation on these matters 	<ul style="list-style-type: none"> • Comments duly noted and the Council will continue to work with GMCA M&MU on an ongoing and constructive basis.

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<ul style="list-style-type: none"> • St Helens Council: Welcomes the commitment made in the draft Statement of Common Ground regarding the two Councils working together, in liaison with Highways England, to consider any cross boundary infrastructure or other issues related to the site specific development of the proposed Bold Forest Garden Suburb for residential development and the Parkside (East and West) sites for employment uses in the St Helens Borough Local Plan Submission Draft. 	<ul style="list-style-type: none"> • Comments duly noted.
Other	
<ul style="list-style-type: none"> • National Farmers Union NW - Planning policies need to provide a framework whereby farm businesses can prosper and also be flexible enough to allow them to develop and meet the needs of modern supply chains and changing consumer demands, as well as in areas such as renewable energy and diversification enterprises. 	<ul style="list-style-type: none"> • Comments noted. The Council is confident that the plan allows for farm businesses to prosper and be flexible as an important part of the rural economy.
<ul style="list-style-type: none"> • Cheshire Garden Trust is disappointed that their contribution is not reflected in the latest draft plan, suggesting that WBC does not recognise the importance of its historic designed landscapes and the contribution that they make to the quality and character of the Borough as a place to live, work and play. These non-designated heritage assets are irreplaceable, and require recognition in accordance with NPPF 16, 20, 184 and 189. 	<ul style="list-style-type: none"> • The Council is confident that the plan makes sufficient provision for designated and non-designated heritage assets and historic landscapes. This is done through Policy DC2 as well as individual heritage assessments for the main allocation sites across the Borough.
<ul style="list-style-type: none"> • Rethinking South Warrington's Future - The requirements of the NPPF have not been satisfied in relation to sustainable development, plan making objectives, delivering a sufficient supply of homes, ensuring the vitality of town centres, promoting healthy and safe communities, Promoting Sustainable transport, Making effective use of land, Protecting green belt land, Conserving and enhancing the natural environment and Conserving and enhancing the historic environment. 	<ul style="list-style-type: none"> • The Council is confident that the requirements of the NPPF have been satisfied in relation to the items listed. These are dealt with in greater detail in the response schedules to individual policies.
<ul style="list-style-type: none"> • Stretton NDP - The plan does not comply with current government thinking, advice and guidelines regarding the safeguarding of Green Belt land. The plan does not comply with the UK and global climate change 	<ul style="list-style-type: none"> • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington's development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of

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<p>and carbon reduction initiatives. Disappointing to find that none of the comments submitted to WBC during the last consultation of the UPSVLP were not acted upon regarding the green belt release, residential developments and green buffer zones proposed specifically within the Stretton parish boundary. The plan does not comply with WBC's own climate emergency declaration as it still advocates a greater reliance on both commercial and private vehicle movements throughout Stretton. This will result in increased noise and air pollution.</p>	<p>the SHLAA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options.</p> <ul style="list-style-type: none"> • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. The spatial strategy of the Plan forms part of the exceptional circumstances. 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. • The SEWUE will include a significant amount of green infrastructure, with consideration also for buffers to existing settlements. This will be considered in greater detail through the preparation of the Development Framework. • Climate change is a key consideration throughout the plan, dealt with specifically through Policy ENV7 as well as through individual site allocation policies.
<ul style="list-style-type: none"> • Our Green Warrington - The UPSVLP 2021 does not meet the requirements of the NPPF 2021 in that it fails to “protect and enhance valued landscapes, sites of biodiversity or geological value and soils”, fails to “minimise impacts on and provide net gains for biodiversity”, puts important ecological networks and natural habitats including irreplaceable ASNW at risk of irreparable harm, fails to prevent “new development from contributing to or putting at unacceptable risk, or being adversely affected by, unacceptable levels of soil, air, water and noise pollution”. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. This has also been assessed in detailed through the Sustainability Appraisal and Habitats Regulations Assessment. • The Council has ensured that the allocation policies include specific provision to protect ecology and provide a significant amount of green infrastructure. New development will be required to include extensive areas of open space, provide a net gain in biodiversity and provide compensatory Green Belt improvements.

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<ul style="list-style-type: none"> • Winwick Parish and Other Residents - The Plan appears to be based on flawed data points which are used inconsistently. The predicted requirements for housing are based on outdated information; yet requirements, for example, on schooling are based on more up to date information. 	<ul style="list-style-type: none"> • The Council has used the 2014 Based Household Projections to establish its minimum housing need figure in accordance with Government Planning Policy and associated Planning Practice Guidance. • Schools data is derived from detailed consultation with the Council's education service who regularly monitor school capacity and growth plans. • The Council is confident that the data used is the most up to date to inform development over the plan period and associated infrastructure needs.
<ul style="list-style-type: none"> • Trams for Warrington - The National Planning Policy Framework 2021 states that plans should achieve sustainable development in a way that is aspirational and also deliverable. The draft plan does not fulfil this brief and, as a consequence, is not sound. 	<ul style="list-style-type: none"> • The Council considers that the plan is in alignment with the requirements of the NPPF and associated planning guidance. The needs of the Borough over the plan period have been determined and a detailed options assessment has been carried out to determine the spatial strategy of the plan. The Council is confident that the UPSVLP identifies the most appropriate development for Warrington over the plan period in a manner that provides an appropriate balance between economic, social and environmental considerations. It has been prepared positively and is aspirational yet deliverable.
<ul style="list-style-type: none"> • HS2 Northern Powerhouse Rail - Concerns regarding uncertainty over key national infrastructure affecting Warrington. 	<ul style="list-style-type: none"> • The plan recognises the need for HS2 Northern Powerhouse Rail and allows for this to be implemented despite the lack of information available at the current time. Further detail can be accommodated through a future review of the plan should this become necessary.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust - welcomes many of the Plan policies in principle such as those covering biodiversity and green infrastructure. There are places where the Plan wording could be strengthened to better reflect national policy. In light of the recent significant changes to national nature conservation legislation and policy, CWT recommend that new nature conservation policies in this draft Local Plan take into account the contents of the Environment Act which recently received Royal Assent, or risk being out of date very early in the proposed plan period. Strongly 	<ul style="list-style-type: none"> • Support and comments noted. The Council considers that the detail included in the plan is sufficient based on the information available to date and is committed to reviewing this should it become necessary. The Council notes the suggestion for a Supplementary Planning Document to deal with BNG measures and this will be kept under review.

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<p>recommend new supplementary planning guidance be drafted to help implement BNG measures. CWT recently contributed to Cheshire East Council's draft BNG SPD and would be keen to assist Warrington Council with this as well.</p>	
<ul style="list-style-type: none"> • Chester University - Requests policy amendments to provide explicit support for the needs of and growth of Chester University over the Local Plan period. 	<ul style="list-style-type: none"> • The Council considers that the Updated PSVLP 2021 as drafted provides for the needs and growth of Chester University and this is reinforced through the Town Centre SPD.
<ul style="list-style-type: none"> • Warrington Disability Partnership: We fully endorse the Council's plans to develop more housing in the town centre in an attempt to increase use of town centre facilities (retail and leisure), but much of what is planned is apartments which offer limited opportunities to adapt to increased needs in terms of mobility and independence. Limiting apartment blocks to just one passenger lift can restrict choice of purchase for many individuals who have mobility impairments as they fear lift breakdowns and being left unable to get to or from the home. Housing outside of the town centre of late has seen very few new build bungalows, and many older bungalows have been adapted into multi floor homes. The trends of late have seen a massive increase in 3 storey houses which have limited appeal to people with mobility impairments. Another area of growth has been over 55's supported housing schemes which are not required by everyone, but with limited availability of affordable bungalows it restricts the choices available. 	<ul style="list-style-type: none"> • Although higher density development is proposed within the Town Centre, there will be the opportunity for dwellings for older and disabled people. Further details on this are set out in the Town Centre SPD 2021. • In preparing the Updated PSVLP 2021, the Council has strengthened its policy on the provision of accessible and adaptable dwellings and is seeking that all new homes are built to Building Regulation requirement M4(2) 'Accessible and Adaptable dwellings' and in addition 10% of new homes will need to meet Building Regulation standard M4(3) 'Wheelchair user dwellings'. • The Council has broadened its requirement in terms of providing housing for older people and states that in residential development of 10 dwellings or more, housing for older people should be provided. This requirement can be met through a range of means and again will be considered on a site by site basis but the Council anticipates that the delivery of bungalows could form part of this. • Affordable housing is required on all elements of new housing that would create self-contained dwellings, including on units provided for older people.

Introduction	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • Support the preparation of a new Local Plan. It is assumed the intention is for the Plan to run from 1st April 2021 to 31st March 2038 in line with Council's monitoring plan. 	<ul style="list-style-type: none"> • The Plan Period is 18 years - from 2021 until 2038 inclusive. In terms of the Council's monitoring process, this includes the monitoring period up to 31st March 2039.
<ul style="list-style-type: none"> • Caution is urged around the reduction in the amount of Green Belt land allocated for development. It is the view of a developer that the amount of land allocated in the outlying settlements is not sufficient to meet identified needs and further release is necessary. The job growth and the number of homes proposed do not match with more homes required and concerns over the deliverability of sites such as Fiddlers Ferry. 	<ul style="list-style-type: none"> • The Updated PSVLP is based on detailed evidence base assessing Warrington's future housing and employment land needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth. • The Council considers that it has given detailed consideration to the growth potential of the outlying settlements through the options assessment process. The level of development proposed in the outlying settlements is considered to be appropriate in the context of the Plan's overall spatial strategy. The level of development can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements and will not change the character of the respective settlements. Further allocations in the outlying settlements are not considered necessary to meet the Plan's housing requirement and could have infrastructure and character impacts. • The site owners have reassured the Council that the proposals are viable and deliverable. This has been confirmed by the Council's own plan-wide viability assessment. The Council has also prepared an addendum to the Local Plan viability assessment to respond to issues raised during the consultation and the Council is satisfied the allocation is viable and

Introduction	
Summary of Issues Raised	Response
	deliverable. The Council therefore remains committed to the delivery of the Fiddlers Ferry allocation site through the Local Plan.
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
<i>Other</i>	
<ul style="list-style-type: none"> • The Trans Pennine Partnership indicate that the allocation of Fiddlers Ferry will impact on the Trans Pennine Trail and National Cycle Network. 	<ul style="list-style-type: none"> • The allocation policy MD3 for Fiddlers Ferry in part 9 requires a comprehensive package of Transport Improvements and specifically mentions the Trans Pennine Trail and cycle networks and the need to improve them and connect into the wider green space network.

Consultation Process	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The consultation period was not long enough to consider all of the information. There were not enough Warrington Borough Council run presentations to attend with ongoing limitations due to the pandemic. 	<ul style="list-style-type: none"> • The consultation was carried out in line with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of the Council’s Statement of Community Involvement. • The Council considers there were sufficient opportunities for members of the public and other stakeholders to engage with Council Officers to assist in them understanding the proposals set out in the Local Plan and to assist them in responding to the consultation. • The Council held 5 public consultation events at Warrington Wolves’ stadium, giving people the opportunity to discuss the Updated Proposed Submission Version Local Plan in detail with Officers. The Council provided briefings and presentation material to Parish Councils across the borough to enable them to undertake their own events. The Council also published an on-line video explaining the key proposals within the Updated Proposed Submission Version Local Plan and how people could make representations. • In addition to the formal consultation events, Planning Officers were available on a daily 9.00am to 5.00pm basis throughout the consultation period to discuss any issues via phone or email.
<ul style="list-style-type: none"> • The consultation period is at odds with the still to be announced Northern Powerhouse Rail/HS2 project - such a route will have a major impact on the local plan. 	<ul style="list-style-type: none"> • Policy INF1 states at Part3 f and g that there will be support for rail infrastructure and services and that there will be engagement on proposals for the delivery HS2 and Northern Powerhouse rail. • Given the timescales for the delivery of Northern Powerhouse Rail / HS2, any significant implications can will be addressed through a future review of the Plan.
<ul style="list-style-type: none"> • The Government has stated there will be changes to the Local Plan process, but the current Warrington Local Plan does not appear to have flexibility 	<ul style="list-style-type: none"> • The preparation of the Local Plan has been undertaken in accordance with the Government’s current NPPF and associated Planning Guidance. The Government has written to all Councils to confirm that they should not delay preparing Local Plans and has confirmed that all Councils need to have an up to date Local Plan in place by 2023.

Consultation Process	
Summary of Issues Raised	Response
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • There has not been enough consultation. Six weeks is not long enough and there should have been other venues as well as the Halliwell Jones Stadium. 	<ul style="list-style-type: none"> • The consultation was carried out in line with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of the Council’s Statement of Community Involvement. • The Council considers there were sufficient opportunities for members of the public and other stakeholders to engage with Council Officers to assist in them understanding the proposals set out in the Local Plan and to assist them in responding to the consultation. • The Council held 5 public consultation events at Warrington Wolves’ stadium, giving people the opportunity to discuss the Updated Proposed Submission Version Local Plan in detail with Officers. The stadium was chosen as the consultation venue as it is a large venue, in a central location within the Town, being close to the Bus Interchange, Train Stations and various car parks. During the Regulation 18 consultation local venues had proved too small to cater for large numbers attending. In 2021 with Covid restrictions and associated concerns for the health and well-being of both staff and attendees, smaller local venues were not considered appropriate. • The Council provided briefings and presentation material to Parish Councils across the borough to enable them to undertake their own events. The Council also published an on-line video explaining the key proposals within the Updated Proposed Submission Version Local Plan and how people could make representations. • In addition to the formal consultation events, Planning Officers were available on a daily 9.00am to 5.00pm basis throughout the consultation period to discuss any issues via phone or email.
<ul style="list-style-type: none"> • Concerns about the online form. There are concerns that it was asking ‘leading questions’ and that it was too complicated to complete. Many residents gave up and did not know that that email comments were acceptable. 	<ul style="list-style-type: none"> • In line with the commitment set out in the Council’s Statement of Common Ground, the Council provided a standard response form to help aid representation submissions. The response form was based on the model representation form produced by the Planning Inspectorate for

Consultation Process	
Summary of Issues Raised	Response
	<p>local planning authorities to use when inviting representations on local plans at publication stage.</p> <ul style="list-style-type: none"> • However, other forms of representation submissions were accepted by the Council, including e-mail and letters. This was made clear on the Council's web site and in notifications provided in respect of the consultation. It should be noted that the majority of responses were received via email or letter.
<ul style="list-style-type: none"> • There is no evidence that the Council has listened to concerns raised during previous Local Plan consultations, including those raised by democratically elected representatives. The Council has failed to "front load" the planning process as required by Government Guidance 	<ul style="list-style-type: none"> • All the representations received during previous consultations have been taken into account in the preparation of the Local Plan. • It should be noted that approval for consultation was obtained following a meeting of Full Council and a further resolution of Full Council will be required for the Plan to be submitted for Examination.
<ul style="list-style-type: none"> • The Council states that due to Covid 19 restrictions they were unable to meet the full commitments of the SCI. Whilst some mitigations were put in place, they were wholly inadequate for meaningful community engagement to inform The Plan. Too much reliance was placed on electronic communication and "web" presence which are unsuitable for the older demographic of specific areas addressed by the plan. 	<ul style="list-style-type: none"> • The Council considers that the consultation was carried out in line with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of the Council's Statement of Community Involvement. • As well as using electronic communications, the Council wrote to those who had responded to previous consultations via letter to inform them of the updated Draft Local Plan consultation with details of the consultation events and how they could access paper copies of the Plan and paper copies of the response forms. An advert was also placed in the Warrington Guardian, informing readers of the start of the Local Plan consultation, and how and where they could get involved. A telephone number was given in both these methods of communication if there were any comments or questions for officers who were available over the phone on a daily basis during normal office hours throughout the consultation period. • Hard copies of the Draft Plan were also available in Local Libraries. Librarians were giving a briefing note to help any resident who may have

Consultation Process	
Summary of Issues Raised	Response
	<p>had questions, and the Council's phone number provided to help direct them to Council Officers who could help with more complex questions.</p> <ul style="list-style-type: none"> • The Council also provided briefings and presentation material to Parish Councils across the borough to enable them to undertake their own events in local areas.
Landowner/Developer	
<ul style="list-style-type: none"> • A further round of Regulation 18 consultation may have been more appropriate given the scale of revisions being proposed compared to the previous PSVLP 2019. 	<ul style="list-style-type: none"> • The Council considers that it has consulted extensively and in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of the Council's Statement of Community Involvement. All the representations received during previous consultations have been taken into account in the preparation of the Local Plan. The Council therefore considers that any further Regulation 18 consultation at this stage would be unnecessary.
<ul style="list-style-type: none"> • Evidence base documents should be published as they are completed rather than waiting for formal consultation in accordance with SCI. A number of evidence based documents are referred to but are not included in the evidence base for the second draft of the plan. A consultation period of longer than 6 weeks would have provided a fairer opportunity to digest and comment. 	<ul style="list-style-type: none"> • The Council has published evidence base documents when completed wherever possible. It should be noted that all key evidence base documents were available as background papers to the 13th September 2021 Cabinet Report from 6th September 2021, ahead of the formal start of consultation on 4th October 2021.
Statutory Consultees	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • The Winwick Parish and Other residents group raise concerns over the approach to public engagement throughout the gestation of the Local Plan. Poorly presented to the public, events poorly organised (at PDO stage). Lack of engagement with representative bodies, including parish councils. The Council has not followed its own SCI. The effectiveness of the consultation process has been weakened as a result. 	<ul style="list-style-type: none"> • The consultation was carried out in line with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of the Council's Statement of Community Involvement. • All the representations received during previous consultations have been taken into account in the preparation of the Local Plan. • The Council considers there were sufficient opportunities for members of the public and other stakeholders to engage with Council Officers to

Consultation Process	
Summary of Issues Raised	Response
	<p>assist in them understanding the proposals set out in the Local Plan and to assist them in responding to the consultation.</p> <ul style="list-style-type: none"> • The Council held 5 public consultation events at Warrington Wolves' stadium, giving people the opportunity to discuss the Updated Proposed Submission Version Local Plan in detail with Officers. The Council provided briefings and presentation material to Parish Councils across the borough to enable them to undertake their own events. The Council also published an on-line video explaining the key proposals within the Updated Proposed Submission Version Local Plan and how people could make representations. • In addition to the formal consultation events, Planning Officers were available on a daily 9.00am to 5.00pm basis throughout the consultation period to discuss any issues via phone or email.

Warrington in Context	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The claim that Omega has created in excess of 8,000 new jobs is unsupported by any evidential material. It is considered that many of the jobs are not new but relocated from elsewhere as existing business consolidated operations. There is evidence that the Covid pandemic has prompted further rationalisation particularly in those parts of the logistics sector related to hospitality. 	<ul style="list-style-type: none"> • The Council considers that Omega has been successful for Warrington in terms of its delivery and the take up of space on this strategic employment site. The Council is confident that the figures quoted in the plan are accurate but recognises that there are short term implications resulting from the Covid pandemic.
<ul style="list-style-type: none"> • Reference to the Town Centre SPD and Town Centre Masterplan - Neither of these documents can be afforded significant weight. The SPD does not supplement the current development plan but anticipates adoption of a later plan. The Masterplan has not been sanctioned under any formal planning process. 	<ul style="list-style-type: none"> • The Town Centre SPD was formally adopted by the Council in June 2021 and so carries significant weight and is a material consideration in determining planning applications. Whilst the position has moved on since the Town Centre Masterplan was originally produced, the relevant elements of this document have now been incorporated into the Town Centre SPD. The Town Centre SPD took into consideration the adopted 2014 Local Plan policies and the fact that the Local Plan was under review.
Landowner/Developer	
<ul style="list-style-type: none"> • No recognition of the fact that historically Warrington has been seen to offer significant potential for growth and for this reason was designated as a New Town. Local Plan now only proposes low to moderate growth ignoring Warrington's potential to grow further in a sustainable way. 	<ul style="list-style-type: none"> • The level of growth proposed in the Updated Proposed Submission Version Local Plan (PSVLP) 2021 has been identified in accordance with the Standard Methodology and Planning Practice Guidance. The alignment between economic growth and housing need has also been considered in detail and this is documented in the EDNA (2021), LHNA (2021) and supplementary statements to both documents updated in 2022. The Council is confident that the level of growth proposed is appropriate in line with projections and government guidance, and importantly can be supported by the necessary infrastructure.
<ul style="list-style-type: none"> • Access to services and infrastructure in Warrington is underplayed. Whilst some outlying settlements may have poor access the town itself is well served. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 recognises that access to services and infrastructure is varied across the Borough. Whilst it is acknowledged that some areas currently have good access to these services, there are

Warrington in Context	
Summary of Issues Raised	Response
	<p>areas even within the main urban area, where services and facilities are in need of improvement. The Updated PSVLP seeks to address these deficiencies, in particular in areas where significant development is proposed over the plan period.</p>
<ul style="list-style-type: none"> • The challenges and opportunities identified will not be addressed as plans for growth through employment and housing development are very low. 	<ul style="list-style-type: none"> • The level of growth proposed in the Updated Proposed Submission Version Local Plan 2021 has been identified in accordance with the Standard Methodology and Planning Practice Guidance. The alignment between economic growth and housing need has also been considered in detail and this is documented in the EDNA (2021), LHNA (2021) and supplementary statements to both documents updated in 2022. The Council is confident that the level of growth proposed is appropriate in line with projections and government guidance, and importantly can be supported by the necessary infrastructure.
<ul style="list-style-type: none"> • Constrained railway services should be recognised as a key challenge and the opportunity to enhance railway services and park and ride facilities should be added. 	<ul style="list-style-type: none"> • Sustainable travel and transport options are a key element of the UPSVLP and are important in terms of its alignment with LTP4.
Statutory Consultee	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust is extremely disappointed that the list of key issues to be addressed fails to mention the ecological or climate emergencies. These are fundamental challenges affecting Warrington, with the impacts of climate change potentially more significant than elsewhere due to the proximity to the River Mersey. The key opportunities listed in paragraph 2.2.4 fails to include investment in the recovery of nature or investment in the green economy. 	<ul style="list-style-type: none"> • In preparing the Plan, Climate Change formed a key consideration in the option assessment and sustainability appraisal process. The Plan's Vision and Strategic Objectives include a commitment to reduce carbon emissions and tackle Climate Change. A number of the Local Plan policies include specific provisions to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change. Individual site allocation policies have a requirement to mitigate the impacts of climate change; promote sustainable transport modes; be as energy efficient as possible and seek to meet a proportion of energy needs from renewable or low carbon sources. However, the Council acknowledges that the

Warrington in Context	
Summary of Issues Raised	Response
	<p>climate emergency should have been included in the list of ‘key challenges’ in section 2 of the Plan. The Council will address this through a ‘Minor Modification’ to the Plan to add “The climate emergency” under paragraph 2.2.2.</p> <ul style="list-style-type: none"> • The Council also acknowledges that investment in the recovery of nature and the green economy should have been included in the list of ‘key opportunities’ in section 2 of the Plan. The Council will address this through a ‘Minor Modification’ to the Plan to add “investment in the recovery of nature” and “investment in the green economy” under paragraph 2.2.4.

Spatial Portrait	
Summary of Issues Raised	Response
<i>Residents</i>	
<ul style="list-style-type: none"> • None. 	
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • None. 	
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • It is clear that the Borough is facing challenges in relation to housing and affordable housing supply. The proposed reduction in housing requirement and allocations to meet this requirement is not sufficient in tackling these challenges identified by the Council. 	<ul style="list-style-type: none"> • The Council is confident that the level of development proposed in the Borough is appropriate and will go some way to address the challenges identified, as backed up by the Plan's supporting evidence base.
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • Historic England – support the content of the Spatial Portrait which sets out the evolution of the town and the contribution it makes to its unique character and identity including its historic environment. 	<ul style="list-style-type: none"> • Support noted.
<i>Other</i>	
<ul style="list-style-type: none"> • None 	

Vision	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Widespread concern that the Plan is too focussed on economic growth resulting in excessive levels of development and Green Belt release, significant impacts on the environment and significant impacts on the character and identity of existing areas. 	<ul style="list-style-type: none"> The Vision provides a comprehensive basis to ensure future development in Warrington is sustainable, giving specific consideration to economic, environmental and social issues. The Plan as a whole and its individual components, including the Vision, have been subject to independent Sustainability Appraisal, to ensure that the Plan provides an appropriate balance between economic, environmental and social factors.
<ul style="list-style-type: none"> The Plan is aspirational but not realistic. Although the aspiration for the creation of infrastructure is acknowledged there is insufficient detail on how it will be delivered, a lack of understanding of the infrastructure required to support the scale of development being proposed and a lack of detail on the timing of infrastructure delivery to support areas coming forward for development. 	<ul style="list-style-type: none"> The Plan is underpinned by a detailed assessment of required supporting infrastructure and a Local Plan Viability Assessment to demonstrate deliverability. Policies within the Plan will ensure that supporting infrastructure is delivered in a timely manner relative to development coming forward.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> The Vision does not consider climate change and promotes unsustainable growth. The Climate Change Emergency and COP26 means the Council should go further and promote sustainable development, less reliant on cars and with reduced development on Green Belt land. 	<ul style="list-style-type: none"> In preparing the Plan, Climate Change formed a key consideration in the option assessment and sustainability appraisal process. The Plan's Vision and Strategic Objectives include a commitment to reduce carbon emissions and tackle Climate Change. A number of the Local Plan policies include specific provisions to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change. Individual site allocation policies have a requirement to mitigate the impacts of climate change; promote sustainable transport modes; be as energy efficient as possible and seek to meet a proportion of energy needs from renewable or low carbon sources The Council considers the Vision and the Local Plan as a whole provides an appropriate balance between economic, social and environmental objectives in accordance with the requirements of the NPPF.
<ul style="list-style-type: none"> Green Belt land is too valuable to the residents of Warrington and to the environment overall and its destruction should not be justified on 	<ul style="list-style-type: none"> The Council is confident that the Plan will meet Warrington's assessed development needs, including those for housing and employment land,

Vision	
Summary of Issues Raised	Response
<p>unrealistic and potentially unachievable economic growth forecasts. The Council appears to have a Plan which is focussed on protecting its industrial property investments rather than creating a Plan for sustainable development which largely protects existing Green Belt. This is an unsound approach to developing the Plan.</p>	<p>in a manner that provides an appropriate balance between economic, social and environmental considerations.</p> <ul style="list-style-type: none"> • As such the Council considers that the Vision and the Local Plan as a whole will contribute to the achievement of sustainable development in accordance with the definition and requirements set out in the NPPF. • The Council has demonstrated through the update of the SHLAA and EDNA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options.
<ul style="list-style-type: none"> • The Vision makes no mention of preserving the Green Belt. The scale of the development will destroy the historic landscape, remaining agricultural land use, open countryside and semi-rural location forever. 	<ul style="list-style-type: none"> • The Vision does not explicitly refer to Green Belt given this is a policy designation, but instead focusses on the quality of Warrington's countryside and natural environment. There is however a specific Strategic Objection on Green Belt which will directly contribute to meeting the Plan's Vision.
<ul style="list-style-type: none"> • The development proposed in the Plan contradicts the Vision. Development will result in the loss of large amounts of Green Belt and countryside and the loss of the distinct identify and character of a number of existing settlements, particularly in south Warrington. 	<ul style="list-style-type: none"> • All development options considered in preparing the Plan have been assessed against the Plan's Objectives which are derived from the Vision. The Council is therefore confident the development proposals in the Plan are consistent with the Vision. Where there are potential conflicts, then appropriate mitigation is included within relevant Plan policies.
<ul style="list-style-type: none"> • Reference to HS2 and Northern Powerhouse Rail intersection further enhancing the Town's connectivity is speculative with no certainty as to direct linkage to HS2 and no specific proposals for Northern Powerhouse rail. Proposals to link an east- west route to Bank Quay station would be practically difficult with wide issues in terms of impact on the Green Belt, ecology and the environment. 	<ul style="list-style-type: none"> • HS2 services will begin to call at Warrington between 2029 and 2033. These will operate on dedicated infrastructure between London and Crewe before using the existing West Coast Main Line. Northern Powerhouse Rail represents a significant aspiration to enhance intra-regional connectivity across the North of England. The Government has confirmed that Northern Powerhouse Rail will serve central Warrington. This provides a unique opportunity as the only location where the West Coast Main Line and potentially HS2 to Scotland can meet Northern Powerhouse Rail at a key economic centre. As such, it is important that this forms part of the Local Plan Vision as well as being integral the Council's Local Transport Plan (LTP4).

Vision	
Summary of Issues Raised	Response
<i>Landowners/Developers</i>	
<ul style="list-style-type: none"> • General support for the Vision in terms of commitment to economic growth but some developers question whether the policies and proposals in the Plan will enable the Vision to be delivered. 	<ul style="list-style-type: none"> • All development options considered in preparing the Plan have been assessed against the Plan's Objectives which are derived from the Vision. The Council is therefore confident the development proposals and policies in the Plan are consistent with the Vision and will contribute to its delivery.
<ul style="list-style-type: none"> • There is a concern that the Vision incorrectly reflects the Plan Period and is not looking forward a minimum of at least 30 years in accordance with the requirements of the NPPF and this is reflected in the Plan failing to safeguard land for beyond the Plan Period. 	<ul style="list-style-type: none"> • The Vision is consistent with the Plan Period of 2021 to 2038 inclusive. This provides an 18 year Plan Period. Para 3.1.3 confirms that the Vision looks ahead for at least the next 30 years.
<ul style="list-style-type: none"> • The vision is too lengthy and its focus and intent is lost. The Vision should be short and concise, setting out the Council's Vision for the Local Plan going forward, and the need to boost housing and employment and the Borough's role in delivering these needs in the Plan period. 	<ul style="list-style-type: none"> • The Council considers that the Plan's Vision is clear in its intent for how Warrington is to develop over the Plan Period and beyond. It provides a common thread running through the Plan's objectives, spatial strategy and individual policies.
<ul style="list-style-type: none"> • The Vision does not reflect the need to enhance the safety of the Strategic Road Network nor the identified gap in provision of Motorway Service Areas. 	<ul style="list-style-type: none"> • The Vision makes specific reference to local and strategic transport networks. The issue of Motorway Service Areas is considered too detailed for specific reference in the Vision.
<ul style="list-style-type: none"> • The vision should include reference to improvements to the existing public transport system, in particular the railways with the opportunity for upgrades to the CLC line through the creation of a new access to Birchwood railway station and the provision of park and ride and other improvements. 	<ul style="list-style-type: none"> • The Vision makes specific reference to local and strategic transport networks. The issue of potential park and ride schemes is considered too detailed for specific reference in the Vision.
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • Historic England supports the inclusion of the historic environment within the Vision (Bullet 6). The long term vision ensures that the Plan can demonstrate a positive strategy for the historic environment in line with the requirements of the NPPF. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • The Warrington NHS Trust supports the Vision for the Town. 	<ul style="list-style-type: none"> • Support Noted
<ul style="list-style-type: none"> • The Chief Constable of Cheshire Police does not support the Vision in its current form as it makes no reference to the need to create and maintain 	<ul style="list-style-type: none"> • The Council considers that such matters are too detailed for the vision but are appropriately dealt with in Policy DC6 - Quality of Place.

Vision	
Summary of Issues Raised	Response
safe, secure and low crime communities, places and buildings in Warrington Borough. This is at odds with paragraphs 8, 97, 119, 130 of the NPPF and the PPG.	
Other	
<ul style="list-style-type: none"> • CPRE considers that the vision prioritises economic factors over social and environmental ones and therefore the Local Plan is imbalanced. 	<ul style="list-style-type: none"> • The Council considers the Vision and the Local Plan as a whole provides an appropriate balance between economic, social and environmental objectives in accordance with the requirements of the NPPF.
<ul style="list-style-type: none"> • Trans Pennine Trail support opening connections to Warrington’s waterways and greenspaces and investing in walking and cycling, which will provide better links to / from the Trans Pennine Trail for residents and visitors to enjoy. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Warrington Climate Emergency Commission welcomes that the Vision of the Plan features recognition of the need to be a carbon neutral and an ‘exemplar green town’, and we encourage the subsequent acknowledgement of a need to transition to renewable energy sources and decentralised networks. However, the climate emergency needs to be identified as being one of the ‘key challenges’ the Borough as a whole faces in the Challenges and Opportunities section of the Plan (Section 2, paragraph 2.2.2). 	<ul style="list-style-type: none"> • Support noted in respect of the vision. • The Council recognises that the climate emergency has been omitted from the list of ‘key challenges’ in section 2 of the Plan in error. This will be addressed through a ‘Minor Modification’ to the Plan. The issue of Climate Change has been fundamental in the preparation of the Local Plan.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust considers that the vision box is lacking in ambition as it fails to reflect the urgency of tackling the climate and ecological emergencies before 2038 or the need to achieve a substantial and widespread net gain in biodiversity. 	<ul style="list-style-type: none"> • The Council considers that the challenge of tackling climate and ecological emergencies are integral to the Vision, as explained in the supporting text under ‘Why we have taken this approach’.

All Objectives	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • The landowner promoting the Fiddlers Ferry allocation welcomes the six strategic objectives 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Concern that the Objectives will not enable Warrington to meet its future development needs. It is not correct to suggest that the draft Plan's objectives have been refined as the representations of developers have not been taken into account. The representations of landowners and other parties which supported higher growth levels have been ignored. 	<ul style="list-style-type: none"> • The Council is confident that the Plan will meet Warrington's assessed development needs, including those for housing and employment land, in a manner that provides an appropriate balance between economic, social and environmental considerations.
<ul style="list-style-type: none"> • There is concern that the draft plan fails to recognise the role of the outlying settlements and that there is over reliance on the urban area which will result in deliverability issues. The draft plan should be able to respond to these issues and secure the vitality and viability of outlying settlements. This should be recognised in the strategic objectives. 	<ul style="list-style-type: none"> • The Council considers that it has given detailed consideration to the growth potential of the outlying settlements through the options assessment process. The level of development proposed in the outlying settlements is considered to be appropriate in the context of the Plan's overall spatial strategy. The level of development can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements and will not change the character of the respective settlements. Further allocations in the outlying settlements are not considered necessary to meet the Plan's housing requirement and could have infrastructure and character impacts
<ul style="list-style-type: none"> • We disagree with the statement that the Objectives support the permanence in the future of the Green Belt or that it complements rather than competes with development within the existing urban area. Sites previously proposed for removal from the Green Belt such as at Burtonwood that were allocated for the sustainable growth of the existing settlement have been removed from the latest version of the Draft Local Plan with no supporting sound planning reasons. 	<ul style="list-style-type: none"> • The spatial strategy of the Plan forms part of the exceptional circumstances for 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. 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.

All Objectives	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This is not planned to come forward until later in St Helen's Plan period and the substantive work around infrastructure requirements and impacts has not been completed. Bold Forest Garden Suburb could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
<i>Other</i>	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •

Spatial Strategy	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • There is no justification for Green Belt release. 	<ul style="list-style-type: none"> • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington's development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA and EDNA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options. • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. The spatial strategy of the Plan forms part of the exceptional circumstances. 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.
<ul style="list-style-type: none"> • The Plan overlooks the potential of the Borough's railway network. Development should be focussed in proximity to existing railway stations with the possibility of providing an additional station on the northern Liverpool to Manchester line. 	<ul style="list-style-type: none"> • The Council has carried out an extensive options assessment process in respect of spatial options for the Plan's spatial strategy and of individual sites in respect of the Plan's site allocations. • The Plan focuses higher density development in the Town Centre and in inner Warrington, which will provide ease of access to Warrington's main railway stations – Warrington Central and Warrington Bank Quay. The new Warrington West Station has been opened in recognition of the large amount of development that has recently been completed, and the further development that is committed, in west Warrington. • All of the Main Development Areas proposed for allocation in the Plan will provide infrastructure improvements to improve accessibility to the town centre and its railways stations.

Spatial Strategy	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Council has previously assessed urban extensions in north and west Warrington. Given issues around Green Belt performance and infrastructure delivery, the Council did not consider that these options performed well enough to merit inclusion in the further options assessment process carried out for the Updated PSVLP. • The Council did give further consideration to residential and employment development in east Warrington, to the south of Birchwood station, in preparing the Updated PSVLP in response to developer proposals. However, the residential element of the proposals was predominantly located in an area of peat reserves and the Council questioned the ability of the site to accommodate a sufficient number of homes to support a new primary school, which is considered essential if a sustainable urban extension is to be accommodated in this location. Together with the strongly performing Green Belt status of this area, the residential element of the proposal was not considered a reasonable option by the Council. The employment element was given more detailed consideration in the options assessment process, but did not perform as well as the proposed allocation sites at Fiddlers Ferry and the South East Warrington Urban Extension. A more detailed response to representations subsequently made by developers promoting land in this area is provided under Policy DEV4. • The Council does not consider it appropriate to locate additional development in proximity to Glazebrook station. The station only has a very limited train service. The adjacent settlement is washed over Green Belt, provides only very limited local facilities and development would have significant Green Belt and environmental impacts. • The Council does not consider there is a realistic prospect of a new station on the northern Liverpool to Manchester Line in Warrington within the Plan Period. This will be kept under review through future reviews of the Local Plan.

Spatial Strategy	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • There is no detail of how the Local Plan proposals will result in the regeneration of the Town Centre. 	<ul style="list-style-type: none"> • The regeneration of the Town Centre is a key element of the Plan’s spatial strategy. There is a specific objective in the Plan in respect of the Town Centre which has meant that Town Centre regeneration has been a key consideration in the options assessment process underpinning the Plan. The plan also contains a specific strategic policy to support the regeneration and growth of the town centre, whilst the Council has approved a Supplementary Planning Document in 2021 to provide more detailed planning guidance for development proposals coming forward in the Town Centre.
<ul style="list-style-type: none"> • There is no detail of how the Plan will preserve the identity of outlying settlements. For example, the plan will increase the number of dwellings in Winwick parish by over 50%. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council considers that the allocations proposed in the outlying settlements are of a relatively limited scale which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters. The level of development in the outlying settlements can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements.
<ul style="list-style-type: none"> • The removal of the Burtonwood allocation that was included in the Previous PSVLP 2019 is acknowledged, but there remains a concern that it will be put into the Plan following the Examination in Public process. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 is not proposing any allocations within the settlement of Burtonwood.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • There is no justification for predicted levels of growth which are central to the spatial expression of the Plan. The Plan takes no account of wider issues of climate change or the impact of losing wide areas of currently undeveloped land to development. There is no need for the scale of Green Belt release proposed. 	<ul style="list-style-type: none"> • The Updated PSVLP is based on detailed evidence base assessing Warrington’s future housing and employment land needs. The Council is not proposing an additional uplift to the housing requirement, as was the case with the previous PSVLP (2019), having considered the most up-to-date economic context, including the impacts of COVID. • The Council considers the spatial strategy provides an appropriate balance between economic, social and environmental objectives, in accordance with the requirements of the NPPF, with climate change being a key consideration.

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Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Having reviewed Warrington’s future development needs and exhausted all potential brownfield sites, the Council considers that the Updated PSVLP 2021 has sought to minimise the amount of Green Belt land being released and has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. • It should be noted that that amount of Green Belt land being proposed is significant less than that proposed in the Previous PSVLP 2019.
<ul style="list-style-type: none"> • The Plan does not support strong and vibrant communities. Employment and accessible and affordable housing is in the wrong place to support existing residents seeking employment. Development will reinforce existing patterns of travel to work, with Warrington importing workers in lower paid less skilled roles and exporting more highly skilled and higher paid workers into Liverpool and Manchester. 	<ul style="list-style-type: none"> • An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area, of which the majority will be located north of the Ship Canal, the Spatial Strategy is ensuring that a large number of new homes will benefit from being in proximity to established and newly developed employment locations. Through ensuring improvements to transport infrastructure, new and existing residents in south Warrington will be able to access these employment opportunities. With regard to new employment locations, the Fiddlers Ferry allocation will provide a wide range of jobs accessible to residents of north Warrington, with the new Western Link improving access for residents of south Warrington. The South East Warrington Employment Area will provide a major new employment site in south Warrington. This will again provide a range of jobs, but the Council acknowledges that the predominant uses will be warehousing and distribution and therefore there will be a relatively large number of lower skilled jobs. This emphasises the importance of providing a wide range of housing types across the borough as a whole and in south Warrington, including provision of 30% affordable housing, to ensure that employees have the opportunity to live in close proximity to their work. The Council also recognises the importance of improving

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Summary of Issues Raised	Response
	transport links to the new employment locations, particularly in respect of public transport, walking and cycling.
<ul style="list-style-type: none"> • A significant proportion of the Plan is based on the ‘unlocking’ ability of infrastructure. However this infrastructure is predicated on funding derived from development which is often not due to come forward until after the Plan Period. This inherent contradiction places in serious doubt the ability of the Plan to deliver much of the proposed employment and housing over the Plan Period. This central failure of the Plan to be deliverable, and thus not be effective and therefore not sound, is not adequately recognised or addressed by the Council. This is deeply concerning and alone necessitates a re-think in the overarching strategy of the Plan before it can be submitted. 	<ul style="list-style-type: none"> • The Plan is underpinned by a detailed assessment of required supporting infrastructure and a Local Plan Viability Assessment to demonstrate deliverability. Policies within the Plan will ensure that supporting infrastructure is delivered in a timely manner relative to development coming forward.
<ul style="list-style-type: none"> • There is no sound or logical connection between aspirational growth and the spatial plan. Plans for growth in the south of the Borough will not benefit the town centre and are contrary to the Council's regeneration aspirations. The physical and functional disconnect between the south of Warrington and the town centre will be exacerbated by the paucity of transport connections. Notwithstanding the scale of development proposed, economic benefit will not accrue to the town centre as a product of, or as justification for the release of the Green Belt. 	<ul style="list-style-type: none"> • The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential economic benefits of focussing development, including that proposed in south Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington. Proposals to improve accessibility to the town centre will also improve access to Warrington Bank Quay and Warrington Central Rail Stations.
<ul style="list-style-type: none"> • Much of the loss of Green Belt land is in the south with significant impacts for this part of the Borough. Development in South Warrington is not sustainable and the plan should be directing development elsewhere to protect it from development. There should be a more equitable spread across the Borough. 	<ul style="list-style-type: none"> • The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development needs and demonstrated that Exceptional Circumstances exist in order to do so. The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt.

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	<ul style="list-style-type: none"> It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the Updated PSVLP 2021 compared to the Previous PSVLP 2019 and that the majority of the new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal.
<ul style="list-style-type: none"> The character and distinctiveness on parts of south Warrington are unduly affected. The South East Warrington Urban Extension envelops Stretton, Appleton Thorn and encroaches on Grappenhall Village. 	<ul style="list-style-type: none"> In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities including Lymm, Grappenhall Village and Appleton Thorn. New development will be required to be built to high design standards, include extensive areas of open space, deliver net biodiversity gain and provide compensatory Green Belt improvements.
<ul style="list-style-type: none"> Major allocations cannot be delivered in the manner presented in the plan. The benefits of the allocations have been over-stated and impacts understated. Further, the options assessment takes no account of the potential balancing factors which might support development in other more appropriate locations. Such factors include proximity to existing employment areas; access to improving infrastructure, including West Warrington Railway Station; proximity and impact on the most deprived wards in the Borough. 	<ul style="list-style-type: none"> The Council has carried out an extensive options assessment process in respect of spatial options for the Plan's spatial strategy and of individual sites in respect of the Plan's site allocations. Through this process the Council is confident it has appropriately considered and balanced a wide range of economic, social and environment factors and the assessment process has incorporated Sustainability Appraisal, Strategic Environment Assessment and Habitats Regulations Assessment.
<ul style="list-style-type: none"> Development proposed in Lymm exceeds the established limits of the settlement. 	<ul style="list-style-type: none"> The Council considers that the allocations proposed in the outlying settlements, including in Lymm, are of a relatively limited scale which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters. The level of development in the outlying settlements, including that proposed in

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	Lymm, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements.
<i>Landowners/Developers</i>	
<ul style="list-style-type: none"> • A number of developers support the general spatial strategy of the Plan and agree that exceptional circumstances exist to justify Green Belt release. 	<ul style="list-style-type: none"> • Support Noted.
<ul style="list-style-type: none"> • Developers promoting employment land not allocated in the Plan express concern that the Plan makes insufficient employment allocations to meet needs over the Plan Period. 	<ul style="list-style-type: none"> • The proposed allocations at Fiddlers Ferry and the South East Warrington Employment Area provide a total of 237.92 ha, which is marginally below the required need by around 8 ha. The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in existing employment locations. The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • A number of developers consider that the Plan is too heavily reliant on delivery of housing on brownfield sites in the existing urban area and additional Green Belt should therefore be allocated. There is particular concern regarding the viability and deliverability of high density development proposed in the town centre and inner Warrington. 	<ul style="list-style-type: none"> • The NPPF requires the Council to make as much use as possible of suitable brownfield sites and underutilised land (para 141). To ensure it meets this requirement, in preparing the Updated PSVLP (2021), the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional masterplanning work in the town

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	<p>centre and surrounding area to identify additional brownfield capacity. This masterplanning work was incorporated into the SHLAA, enabling each site to be assessed in terms of availability and deliverability.</p> <ul style="list-style-type: none"> • The Council acknowledges that it had not clearly identified all of the sites which formed its urban capacity figure. Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. This has resulted in a marginal decrease in urban capacity which is not material to the Plan's overall land supply position. • The Council has also produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington. The Council is confident these sites will come forward and will compliment suburban and Green Belt release sites which together will provide a wide range of housing types to meet Warrington's needs.
<ul style="list-style-type: none"> • Developers promoting sites north of the Ship Canal express concern that the spatial strategy is heavily dominated by sites in the south of the Borough where infrastructure provision is poorer and the impacts of development upon the environment would be more pronounced. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt. • It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP compared to the 2019 PSVLP; that the majority of the new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal;

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	<p>and that the Plan is proposing two new employment allocations of which one is north of the ship canal and one is to the south.</p> <ul style="list-style-type: none"> • A series of key transport infrastructure improvements are required to support the proposed development allocations in south Warrington. The Council is confident that development in the South East Warrington Urban Extension and the South East Warrington Employment Location will deliver significant transport and social infrastructure improvements.
<ul style="list-style-type: none"> • Developers promoting sites outside of the Main Development Areas have raised the concern that The Plan places too much reliance on the delivery of a few very large sites. They consider these sites have longer lead in times, greater infrastructure requirements and represent a risk to the Plan if one or more of these sites do not come forward as envisaged. There are particular concerns in respect of Fiddlers Ferry given the requirement to demolish and remediate the former power station and in respect of the South East Urban Extension given the scale of infrastructure required to support the allocation. • Developers are therefore reasoning that consideration should be given to, small and medium sized sites - on the periphery of Warrington and the outlying settlements – and / or smaller settlement expansions which are less critically reliant on major infrastructure improvements prior to the commencement of development and are capable of being brought forward in the early years of the Plan 	<ul style="list-style-type: none"> • 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 (para 73). This is reflected in the results of the spatial options assessment and SA/SEA which has informed the Plan’s Spatial Strategy. • In preparing the Updated PSVLP 2021, the Council undertook a comprehensive Local Plan Viability Assessment. As part of this work, the Council reviewed all infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. This work demonstrates that the infrastructure required to deliver these sites is capable of being delivered. • The Council recognises that the Main Development Areas will have relatively long lead in times. As such the Plan proposes a stepped trajectory, which is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The Spatial Strategy already ensures additional sites will come forward from the proposed Green Belt release in the outlying settlements and at Thelwall Heys early in the Plan Period. • The Council also recognises a degree of risk associated with a relatively large proportion of development being proposed within the Main Development Areas. This is reflected in the benchmark flexibility factor in the land supply of 10% - which equates to a similar size to one of the Plan’s large allocation sites – and the inclusion in the Plan of a review

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	mechanism should housing land supply not be delivered in accordance with the planned trajectory.
<ul style="list-style-type: none"> • Directing increased levels of housing to the Town Centre, primarily in the form of high density apartments can and should continue to be encouraged, however any proposed increase in delivery rates should be dealt with independently of the housing requirement for Warrington. Serious viability and deliverability concerns exist from this particular source of housing land supply. 	<ul style="list-style-type: none"> • Residential development within the town centre will provides an integral component of meeting Warrington’s overall housing needs. The Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington.
<ul style="list-style-type: none"> • The Spatial Strategy should be amended to incorporate development on the east side of the Warrington built up area, specifically in respect to the identification of South Station Place for development, where it can be assimilated with public transport improvements. The final bullet point to paragraph 3.3.18 should be deleted as it is not accepted that an urban extension to the east of Warrington would have significant ecological impacts as there is sufficient land available outside of any designated mossland or areas of biodiversity significance and the minerals reserves are not of such significance such that they would prevent development taking place 	<ul style="list-style-type: none"> • The Council has given consideration to development of land to the east of Warrington as part of its options assessment process. The Council previously considered land to the south of Birchwood station as a potential residential site, but concluded it was not a reasonable option given underlying peat is present, lack of evidence on deliverability and concerns whether there would be sufficient land to deliver a sustainable residential community with supporting social infrastructure. • The Council did assess land at M6 Junction 21 as a potential employment option, but it was not selected for allocation given issues around deliverability and highways. • The Council has reviewed the information submitted by the developer but is of the opinion that at this stage, land to the south of Birchwood Station is also an unreasonable option for employment development. The developer has carried out some provisional investigation into underlying peat, but the Council’s ecological consultants do not think this is sufficient to overcome what would likely to be a significant objection from Natural England. Further, whilst the Council agrees there are long term benefits in terms of access to the station and potential improvements to the station including a new park and ride facility, the developer has not submitted any detailed proposals in terms and viability and deliverability. Further, the daytime frequency of rail services on the Warrington to Manchester / Liverpool line ,including and in particular at

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	<p>Birchwood Station, is planned to be reduced from December 2022 as part of Network Rail’s Manchester Rail Recovery Taskforce programme. Therefore, whilst the principle of station improvements is supported by Network Rail and the Rail Delivery Group, and the Council continues to lobby hard for further enhancements, the Council is concerned at this stage, that the committed service levels from December 2022 are unlikely to support the business case for the station improvements and park and ride facility proposed, and insufficient evidence has been produced by the developer to indicate otherwise. As such, the Council will consider land south of Birchwood as part of any future review of employment land in accordance with Policy DEV4 of the UPSVLP.</p>
<ul style="list-style-type: none"> • Developers promoting sites in the outlying settlements consider that the Council’s selection of a strategy of incremental growth within the Outlying Settlements is based on unsubstantiated and incomplete evidence and a flawed approach to the appraisal of spatial options. Developers consider the Council has made a number of flawed conclusions regarding the adverse impacts of supporting a higher level of growth within the Outlying Settlements and has attempted to do so without reference to specific sites and development proposals as required to fully understand such impacts and the realistic growth capacity of these settlements. In their view the Council has presented no evidence to define the development needs of the Outlying Settlements and establish how much housing they need to accommodate to achieve a viable future. They consider the 10% growth proposal is entirely arbitrary and is wholly unproven to be sufficient in this regard. 	<ul style="list-style-type: none"> • The Council has assessed options for varying levels of growth in the outlying settlements. The options assessment process has taken into account existing infrastructure within each of the settlements and has been undertaken working closely with other Council teams and partner agencies responsible for service provision. This has included the Council teams responsible for education, parks and open spaces, transportation, culture and leisure and public health, together with the NHS Warrington Clinical Commissioning Group and other NHS services operating in the borough. The Council has also engaged with statutory consultees including Natural England, the Environment Agency, National Highways, Historic England and United Utilities in developing the spatial strategy of the Plan. Given the relatively small geographic extent of the borough and the dominance of the main urban area, development needs have primarily been considered at a borough-wide level. The Council does not consider it is practical to undertake detailed housing, employment and retail needs assessments for each individual settlement. There is however scope for this to be undertaken by neighbourhood planning groups in preparing more detailed neighbourhood plans. As such the Council considers that the options assessment process it has undertaken

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	<p>has been thorough and proportionate to the level of detailed required to prepare a Local Plan.</p> <ul style="list-style-type: none"> • The evidence collated to support the area profiles and options appraisal work concluded that growth in the order of 10% in the Outlying Settlements can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. A planning judgement has been made that this level of development would not change the character of the settlements to the same extent as a larger settlement extension, the next level of growth that was considered as part of the assessment process. Specific consideration was given to sites submitted as part of the 'call for sites' exercise in undertaking the high level spatial options assessment. • 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%.
<ul style="list-style-type: none"> • Developers promoting sites adjacent to 'washed over' settlements consider there is a requirement to look at the needs of smaller villages, including an assessment of whether such villages should be inset within the Green Belt or washed over. 	<ul style="list-style-type: none"> • The Council does not consider there has been any material change in any of the washed over Green Belt settlements that would alter the rationale for their classification following the adoption of the Local Plan Core Strategy in 2014. Given the limited size of the washed over settlements and their lack of service provision, the Council does not consider that these are sustainable locations for development. There are a limited number of washed over settlements which have either been removed from the Green Belt or have had their boundaries revised as a consequence of Green Belt boundary changes in respect of the main urban area.
<ul style="list-style-type: none"> • The Spatial Strategy fails to identify provision to meet the need for a Motorway Service Area 	<ul style="list-style-type: none"> • The provision of a Motorway Service Area is considered too detailed for the spatial strategy of the Plan.
Statutory Consultees	
<ul style="list-style-type: none"> • No specific responses made by statutory consultees to Plan's spatial strategy. 	<ul style="list-style-type: none"> • N/A

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Other	
<ul style="list-style-type: none"> • Rethinking South Warrington - No justification for the scale of Green Belt release proposed. The proposed spatial options will not just lead to Green Belt loss but we will actually create infrastructure chaos as there are serious questions about how the existing highways network will cope with additional housing when it is already under great strain. 	<ul style="list-style-type: none"> • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington’s development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA and EDNA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options. • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. The spatial strategy of the Plan forms part of the exceptional circumstances. 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. • The Council has assessed the impacts of the Plan on the Borough’s highways network through its Warrington Multimodal Transport Model and is confident that with the identified transport infrastructure improvements set out in the Plan, these impacts can be mitigated.
<ul style="list-style-type: none"> • Our Green Warrington - With the chosen location for the SEWUE, the plan fails to recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland as referred to in the NPPF. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. This includes consideration of ecological assets and the quality of Agricultural land. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities including Lymm, Grappenhall Village and Appleton Thorn.

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Summary of Issues Raised	Response
	New development will be required to be built to high design standards, include extensive areas of open space, deliver biodiversity net gain and provide compensatory Green Belt improvements.
<ul style="list-style-type: none"> • Stretton NDP - Concerned that along with recent consents, development at SEWUE will mean that Stretton is inundated with new housing bringing about unjustified growth to the detriment of the village and community. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development, including Stretton. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities. New development will be required to be built to high design standards, include extensive areas of open space, deliver biodiversity net gain and provide compensatory Green Belt improvements.
<ul style="list-style-type: none"> • Lymm NP Group - Concern that the Plan housing requirement is too high and Green Belt release should only be allowed if absolutely necessary. At present there are no exceptional circumstances for green belt release and urban capacity has not been sufficiently considered. • Lymm has seen significant development over the last 40 years, with next to no investment in infrastructure. The current draft Local Plan does not commit to correcting this. There are extremely poor transport links between south Warrington and the Town Centre. 	<ul style="list-style-type: none"> • The Plan's housing requirement is the minimum housing need figure under the Government's standard housing method. In meeting the requirements of the NPPF, the Council is required to ensure that Warrington's development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options. • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. The spatial strategy of the Plan forms part of the exceptional circumstances. 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

Spatial Strategy	
Summary of Issues Raised	Response
	<p>will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole.</p> <ul style="list-style-type: none"> • The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington. • The Council considers that the allocations proposed in the outlying settlements, including in Lymm, are of a relatively limited scale which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters. The level of development in the outlying settlements, including that proposed in Lymm, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements.
<ul style="list-style-type: none"> • Trans Pennine Trail - The development of the Fiddlers Ferry and Thelwall Heys sites should provide opportunities to link to the Trans Pennine Trail and improve its current condition as a major green infrastructure route. 	<ul style="list-style-type: none"> • Specific references to providing connections to the Trans Pennine Trail are included in the site allocation policies for the Fiddlers Ferry and Thelwall Heys sites.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust - Believe the Fiddlers Ferry allocation is unsound and should not be developed at the scale currently proposed given the site is an important environmental asset that supports the neighbouring international, national and local designated sites for nature conservation. 	<ul style="list-style-type: none"> • It is considered that the HRA has adequately assessed the impact of the proposed allocation on the Mersey Estuary SPA. The HRA of the Local Plan has assessed the policy and allocation in broad terms (i.e. the principle of development on this site for 101ha of employment land, a minimum of 1,760 new homes and community facilities), rather than the details of any particular masterplan, vision, or developer aspirations. The assessment carried out has to be proportionate to the stage of the plan or proposal at the time. Adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure. • The site allocation policy (MD3) requires a project specific HRA to be undertaken if habitats within the allocation site or on adjacent land are found to support significant populations of qualifying species of wintering birds.

Spatial Strategy	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Trams for Warrington - The proposed Green Belt release is not justified as the housing target is too high. 	<ul style="list-style-type: none"> • The Plan's housing requirement is the minimum housing need figure under the Government's standard housing method. In meeting the requirements of the NPPF, the Council is required to ensure that Warrington's development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options.

Key Diagram	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	
Landowner/Developer	
<ul style="list-style-type: none"> • Extra MSA Group consider that there is a need for an amendment to the Key Diagram to reflect the need for MSA through identification of the Optimal Search Area or through identifying the allocation of land at Junction 11 of the M62 Motorway. 	<ul style="list-style-type: none"> • The provision of a Motorway Service Area is considered too detailed for inclusion in the Key Diagram of the Plan.
Statutory Consultee	
<ul style="list-style-type: none"> • None 	
Other	
<ul style="list-style-type: none"> • The Key Diagram should be replaced with a plan of similar detail to the Local Plan Policies Map. 	<ul style="list-style-type: none"> • The Key Diagram is an over-arching strategic guide to the Spatial Strategy and to the key objectives. The Policies Map shows the policies and allocations in detail. It is not considered necessary to put more detail into the Key Diagram as this would confuse its role with that of the Policy Map.

<p>Objective W1 To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:</p> <ul style="list-style-type: none"> • delivering a minimum of 14,688 new homes (equating to 816 per year) between 2021 and 2038, and • supporting Warrington’s ongoing economic success by providing 316.2 Hectares of employment land between 2021 and 2038. 	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • A carbon zero target sits better within a sustainable objective rather than a proposal to build 4,200 houses in south Warrington. 	<ul style="list-style-type: none"> • In preparing the Plan, Climate Change and carbon reduction formed a key consideration in the option assessment and sustainability appraisal process. The Plan’s Vision and Strategic Objectives include a commitment to reduce carbon emissions and tackle Climate Change. A number of the Local Plan policies, including the allocation policies, include specific provisions to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change.
<ul style="list-style-type: none"> • Concerns that the economic growth and has been over-estimated with no account of the pandemic and other factors that will mean lower jobs growth, this in turn means housing figures are over-estimated and therefore the Local Plan therefore fails to demonstrate sustainable growth. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth. The Council is not proposing an additional uplift to the housing requirement, as was the case with the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID, through its Economic Development Needs Assessment (EDNA 2021).
<ul style="list-style-type: none"> • The refresh of the EDNA was published simultaneously with the PSVLP, has the EDNA properly been considered? The study relies heavily on a continued growth scenario in the assumption, it is a concern that the approach is unreliable and unrealistic. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive EDNA (2021), including using data which post-dates the EU Brexit referendum, and taking into account the revised Oxford Economics and Cambridge Econometrics forecast for 2021. The Council is therefore confident the amount of land being proposed for employment in the UPSVLP (2021), based on past

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- **supporting Warrington’s ongoing economic success by providing 316.2 Hectares of employment land between 2021 and 2038.**

Summary of Issues Raised	Response
	<p>take up rates is robust and the most appropriate method to determine the amount of employment land need.</p> <ul style="list-style-type: none"> • In line with national policy, the Council’s EDNA (2021) looks at evidenced market demand/needs and this includes the locational and premises requirements of business needs.
<ul style="list-style-type: none"> • The deliverability of the plan can be questioned in a number of ways: unachievable growth levels; failure of delivery of housing build rates in the past; funding of infrastructure; and viability. The plan cannot be considered sound due to the lack of evidence on the costs and funding of infrastructure. Costs against the SWUE in the IDP are put at £45k a dwelling which equates to £199million. However the costs do not cover a new leisure centre or crossing over the ship canal etc. The Parish Council feels the Council should provide more detail and certainty around the costs. 	<ul style="list-style-type: none"> • The Council acknowledges the recent relatively low level of housing completions. However, when considered over a 20 year period, Warrington’s average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council’s housing target was only 380 per annum up to 2014. The Council’s housing trajectory projects an increase in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will establish a housing land supply to support the Plan’s housing requirement over the Plan period as a whole. • To support its approach the Council has prepared a comprehensive Local Plan Viability Assessment and assessed the Plan’s policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. Reference should also be made to the Infrastructure Delivery Plan (IDP) which has been developed with partners – including Council and external partner service providers to identify the community infrastructure required to support new development.

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Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Council’s EDNA 2021 demonstrates the strong demand for employment land in Warrington and the Council is confident the Plan’s employment allocations will be delivered within the Plan Period.
Landowner/Developer	
<ul style="list-style-type: none"> • Supportive of the requirement to deliver ambitious housing growth in Warrington, which goes hand in hand with the Borough’s economic growth aspirations. Some developer’s state that targets should very much be viewed as a minimum, and capable to being exceeded through additional housing land in order to boost significantly the supply of housing in Warrington consistent with the NPPF and that the Council builds a contingency into the emerging Local Plan for a slippage/shortfall in housing delivery during the Plan period. 	<ul style="list-style-type: none"> • Support noted • The Plan confirms that the housing requirement is a minimum figure. The Council has built in contingency into its housing and employment land supply. • The Council considers that the amount of new homes proposed over the Plan period is appropriate and justified and is backed up by the plan’s extensive evidence base.
<ul style="list-style-type: none"> • Objective W1 sets out the strategic objective of delivering 816 homes per year (14,688 homes over the plan period). The supporting text goes on to suggest that 816 homes per annum will support the number of jobs that will be created from Warrington’s future economic growth. It cannot be concluded that this objective is positively prepared, justified or effective. 	<ul style="list-style-type: none"> • The previous PSVLP 2019 housing target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council’s economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 – in line with the Government’s Standard Housing Methodology - will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period. • The Council’s position is re-enforced through the EDNA Addendum (2022) and LHNA addendum (2022) prepared in response to key issues raised from the Updated PSVLP consultation.

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Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The Plan fails to allocate sufficient employment land and the objective should confirm the employment land requirement as a minimum figure. 	<ul style="list-style-type: none"> • The proposed allocations at Fiddlers Ferry and the South East Warrington Employment Area provide a total of 237.92 ha, which is marginally below the required need by around 8 ha. The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in existing employment locations. The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington’s employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • Supportive of the objectives however suggest a modification to W1 with the inclusion of a specific reference to the importance of brownfield land redevelopment and the preference that this is land developed first. 	<ul style="list-style-type: none"> • The Objective makes specific reference to the ongoing regeneration of inner Warrington which is focussed on brownfield development and is a key priority of the Plan. • A number of brownfield sites in the Plan’s housing supply are not able to come forward until later in the Plan Period, due to issues including land assembly, land remediation and infrastructure constraints. As such, the Council is not able to sequence its land supply so that brownfield land is developed first.

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- supporting Warrington’s ongoing economic success by providing 316.2 Hectares of employment land between 2021 and 2038.

Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The Extra MSA group is concerned that the strategic gaps in the provision of MSAs, alongside the public safety need, is not highlighted in the plan. Correspondingly, the policy and public safety need for the provision of an MSA is not fully reflected within the Objectives of the Plan. In particular Objective W1 should reflect the policy need for such development, with amendments to the associated explanatory text to reflect the policy need for MSA development. 	<ul style="list-style-type: none"> • The Vision and objectives makes specific reference to local and strategic transport networks. The issue of Motorway Service Areas is considered too detailed for specific reference within the objectives. In addition, there is no specific requirement for the Local Plan to make provision for a Motorway Service Area.
Statutory Consultees	
<ul style="list-style-type: none"> • The Warrington NHS Trust supports the commitments within this objective for affordable housing and efforts to provided suitable accommodation for older people. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Cheshire Constabulary believes that safe and secure neighbourhoods are key to sustainable development and that this should be reflected in the objectives which need amending to reflect this and the NPPF guidance which supports this approach. 	<ul style="list-style-type: none"> • The Council considers that such matters are too detailed for the objectives but are appropriately dealt with in Policy DC6 - Quality of Place.
Other	
<ul style="list-style-type: none"> • The Council for the Protection of Rural England (CPRE) states that there is too much land released in the draft Plan for housing and employment purposes. 	<ul style="list-style-type: none"> • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington’s development needs will be met in full over the Plan period. The Council has demonstrated through the update of the SHLAA and EDNA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options. • It should be noted that the Council is planning to meet the minimum housing need figure under the Government’s standard housing methodology but is no longer proposing to apply an uplift to support economic growth aspirations as was the case with the previous 2019

Objective W1 To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:

- **delivering a minimum of 14,688 new homes (equating to 816 per year) between 2021 and 2038, and**
- **supporting Warrington’s ongoing economic success by providing 316.2 Hectares of employment land between 2021 and 2038.**

Summary of Issues Raised	Response
	<p>PSVLP. In preparing the updated PSVLP 2021 the Council also updated its EDNA to take into account the terms of the Brexit agreement and the impacts of COVID-19. The LHNA has also been updated.</p>
<ul style="list-style-type: none"> • Warrington Action Against Inappropriate Development don’t believe the Plan is legally compliant as government guidance is to use brown belt land in the first instance. Government is proposing to scrap UK building targets as it has been over estimated and deemed against environmental policy and residential amenity. 	<ul style="list-style-type: none"> • The Council has established its housing requirement in accordance with the Government’s Planning Policy and associated Planning Practice guidance. The Council is also confident the Local Plan will maximise the amount of development that is possible on brownfield land. • A detailed response to these issues is included in the responses under Policy DEV1 Housing Delivery, Policy DEV4 Economic Growth and Development and Policy GB1 Warrington’s Green Belt.

Policy DEV1 - Housing Delivery	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The Secretary of State has confirmed that the Standard Housing methodology is the starting point and the housing target to be included in a Local Plan should be decided locally. Councils are permitted to reduce housing numbers where towns and cities are constrained. Given Green Belt and infrastructure constraints, Warrington should reduce its housing number. 	<ul style="list-style-type: none"> • The standard housing methodology defines the minimum housing need figure for a Council's area. The Council has demonstrated that the infrastructure required to support a housing target in line with the standard housing methodology is capable of being delivered and that areas of Green Belt can be released without compromising the overall function of Green Belt across the borough and the wider sub-region. It should be noted that all neighbouring boroughs have either released Green Belt in their adopted Plans or are currently preparing Plans which are proposing to do so. As such, in considering the Presumption in Favour of Sustainable Development, as set out in paragraph 11 of the NPPF, the Council does not consider there are any strong reasons for restricting the overall scale of development in Warrington and setting a housing requirement below the minimum housing need figure.
<ul style="list-style-type: none"> • 2014 projections are out of date and subsequent ONS data show lower housing numbers required. If the 2018 population and household projections were used, there would be a much lower housing requirement. The rate of growth also decreases over time which results in a lower overall housing requirement. 	<ul style="list-style-type: none"> • The Council has used the 2014 Based Household Projections to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance.
<ul style="list-style-type: none"> • Plans for housing and economic growth are not realistic given economic uncertainty following the COVID Pandemic. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the higher housing target in the previous PSVLP 2019. The Council is not proposing an additional uplift to the housing requirement, as was the case with the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID.

Policy DEV1 - Housing Delivery	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Proposed number of new homes is significantly above the levels which Warrington has historically delivered. Past delivery rates are around 700 a year over the last 30 years reducing to around 500 homes a year over the last decade. A more realistic housing requirement could be accommodated without the need for Green Belt release. 	<ul style="list-style-type: none"> The Council considers the revised housing requirement is ambitious but achievable. The Council acknowledges the recent relatively low level of housing completions. However, when considered over a 20 year period, Warrington's average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council's housing target was only 380 per annum up to 2014. The Council's housing trajectory projects an increase in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will establish a housing land supply to support the Plan's housing requirement over the Plan period as a whole.
<ul style="list-style-type: none"> The Council does not have a full record of all the brownfield sites in the borough suitable for housing and has not kept its Brownfield Register up to date. There are Brownfield sites likely to be released within the plan period of the plan which have not been taken into consideration, including Warrington Hospital. There is the potential for higher density development in the town centre and in inner areas of Warrington whilst every effort should be made to bring existing empty properties back into residential use together with vacant space above shops. Brownfield sites can make a bigger contribution to the town's housing needs so that Green Belt release can be minimised. 	<ul style="list-style-type: none"> In preparing the Updated PSVLP 2021, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity, which was incorporated into the SHLAA. Following consultation on the updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. The Plan makes specific reference to the hospital site. The potential of other major brownfield sites such as the Unilever site have also been considered through the town centre master planning process. They are

Policy DEV1 - Housing Delivery	
Summary of Issues Raised	Response
	<p>considered to provide potential additional development capacity, although there is insufficient certainty at present for these sites to be included within the Council's identified residential or employment land supply. These, together with other potential brownfield sites, are part of the reason why the Council does not consider it needs to remove land from the Green Belt for 'safeguarding' for development beyond the Plan period.</p> <ul style="list-style-type: none"> • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan. • The Local Plan contains policies which support bringing empty properties back into use and which support residential development in the town centre and other shopping centres, including vacant space above shops. The Council's Local Housing Needs Assessment has given consideration to the number of vacant properties in the borough.
<ul style="list-style-type: none"> • Green Belt should not be released until all brownfield sites have been exhausted. Releasing Green Belt straight away will reduce the incentive for developers to build on brownfield sites. Green Belt release may also not be required if the need for new homes decreases over time. 	<ul style="list-style-type: none"> • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington's development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options. • A number of brownfield sites in the Plan's housing supply are not able to come forward until later in the Plan Period, due to issues including land assembly, land remediation and infrastructure constraints. As such, the Council is not able to sequence its land supply to only allow Green Belt development once all brownfield sites have been built out.
<ul style="list-style-type: none"> • There is no connection between proposed job creation and the housing need. It is already the case that a large number of the recently built houses are occupied by people who commute into Manchester or Liverpool. There is therefore no particular logic to increasing the scale of 	<ul style="list-style-type: none"> • The Council considers that the Plan's housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the borough. If the Plan was to provide for

Policy DEV1 - Housing Delivery	
Summary of Issues Raised	Response
<p>housing in South Warrington simply to grow the commuter village, traffic problems and strain on public services that already exist. The jobs that are purported to be created from additional warehousing and logistics will be far less than proposed (due to automation over the timeline of the plan). Also the majority of people in the jobs that are created in south Warrington are unlikely to live in the immediate area given high house prices and will commute from lower priced locations elsewhere in Warrington and neighbouring boroughs, thereby adding further to traffic congestion.</p>	<p>a lower number of homes then it is likely that this will result in increased commuting into the borough, increasing congestion on Warrington's transport network and risking worsening air quality on some of the busier transport corridors where people live. It is also likely to increase housing pressures in Warrington and in neighbouring authorities. The Plan proposes a range of housing types, including a substantial provision of affordable housing, to reflect the range of jobs that will be created in Warrington over the Plan period.</p>
<ul style="list-style-type: none"> • There are widespread concerns that existing infrastructure is already over capacity and that new infrastructure will not be provided to support new homes. The Plan should be amended to allow staggered development over the Plan period to allow services time to identify and resolve infrastructure needs and to reduce risks of oversupply in delivering new housing. 	<ul style="list-style-type: none"> • The Plan is based on a detailed assessment of the Borough's existing infrastructure and the new and improved infrastructure required to support the proposed level of growth. The Plan has specific policy requirements to ensure that infrastructure improvements are coordinated with new development. This is also reflected in the Plan's stepped housing trajectory which proposes a lower level of development in the early years of the Plan to reflect the lead in times to deliver required infrastructure.
<ul style="list-style-type: none"> • The majority of the population increase will be in over 65 years olds who will not require large houses or employment. 	<ul style="list-style-type: none"> • As set out in its Local Housing Needs Assessment (2021), the Council has given detailed consideration to the full range of age groups within the population in establishing its housing requirement.
<ul style="list-style-type: none"> • The housing market in Warrington is healthy and there is a good supply of homes to buy and rent and a large number of empty properties. 	<ul style="list-style-type: none"> • The Council is planning for a housing requirement to address identified issues of housing affordability in Warrington - as evidenced in the Local Housing Needs Assessment (2021) - and to ensure that that sufficient homes are provided to support the planned level of economic growth.
<ul style="list-style-type: none"> • There is no evidence of a joined up approach into how Warrington's plan connects with the plans of neighbouring councils. The Local Housing Needs Assessment and Employment Land Forecasts do not seem to take into account the effect of the successful regeneration of Manchester and Liverpool will have on the future demand for residential and employment land in Warrington. 	<ul style="list-style-type: none"> • The Council has established its housing requirement working closely with neighbouring boroughs through the 'Duty to Cooperate'. This is evidenced in the Council's Statement of Common Ground and Duty to Cooperate Statement.

Policy DEV1 - Housing Delivery	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The flexibility factor is excessive, resulting in more Green Belt land being released than necessary. Flexibility is not required given the Plan is to be reviewed every 5 years. 	<ul style="list-style-type: none"> • 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. 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 flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.
<ul style="list-style-type: none"> • The Council should not be planning for 18 years given uncertainty of COVID and Brexit and the Government have confirmed a forthcoming review of its housing methodology. The Plan should be held back until there is clarity on these issues otherwise there is a risk that more Green Belt land will be released than is necessary. 	<ul style="list-style-type: none"> • The Plan period is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption. The Government has confirmed that all Councils must have an up to date Plan in place by 2023 and has instructed all Council to continue to progress their Local Plans.
<ul style="list-style-type: none"> • Object to including provision for development on Green Belt land for beyond the Plan Period. 	<ul style="list-style-type: none"> • In order to ensure the permanence of the amended Green Belt boundaries, in accordance with the requirement of the NPPF, the Council needs to consider development beyond the plan period. In addition, given the Council is promoting major urban extensions as part of its spatial strategy, the Council has given consideration to an overall timescale of 30 years in accordance with paragraph 22 of the NPPF which requires Council's to provide a longer term vision when promoting such forms of development.
<ul style="list-style-type: none"> • The level of housing development will destroy the character of local communities and put excessive strain on important residential and local community services. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities including Grappenhall village, Appleton Thorn and Stockton Heath. The Council considers that the allocations proposed in the outlying

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	<p>settlements are of a relatively limited scale which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters.</p> <ul style="list-style-type: none"> • The Council accepts that current infrastructure and services are not sufficient to support the level of development proposed in the Main Development Areas. The Main Development Areas are therefore dependent on a wide range of improvements to existing infrastructure and provision of new infrastructure. The level of development in the outlying settlements can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • The previous Secretary of State for Housing, Communities and Local Government the standard methodology is a starting point rather than a target. 	<ul style="list-style-type: none"> • The standard housing methodology defines the minimum housing need figure for a Council's area. The Council has demonstrated that the infrastructure required to support a housing target in line with the standard housing methodology is capable of being delivered and that areas of Green Belt can be released without compromising the overall function of Green Belt across the borough and the wider sub-region. It should be noted that all neighbouring boroughs have either released Green Belt in their adopted Plans or are currently preparing Plans which are proposing to do so. As such, in considering the Presumption in Favour of Sustainable Development, as set out in NPPF para 11, the Council does not consider there are any strong reasons for restricting the overall scale of development in Warrington and setting a housing requirement below the minimum housing need figure..
<ul style="list-style-type: none"> • Plans for housing and economic growth are not realistic given economic uncertainty following the COVID Pandemic. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth. The Council is not proposing

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	<p>an additional uplift to the housing requirement, as was the case with the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID, through its Economic Development Needs Assessment (EDNA 2021).</p>
<ul style="list-style-type: none"> • 2014 projections are out of date and subsequent ONS data show lower housing numbers required. If the 2018 population and household projections were used, there would be a much lower housing requirement. The Council is justified in using more recent projections in accordance with Paragraph 61 NPPF which would result in a lower housing requirement. A number of alternative housing targets have been put forward ranging from 458 dwellings per annum to 600 dwellings per annum. 	<ul style="list-style-type: none"> • The Council has used the 2014 Based Household Projections to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance.
<ul style="list-style-type: none"> • The Borough's Housing Strategy 2018-2028 states that Warrington needs 586 houses per year up to 2037. 	<ul style="list-style-type: none"> • The Council's existing Housing Strategy was published in 2018 and identified the need for 4,000 new homes to 2022 and 9,000 new homes to 2027. It confirmed that these targets are subject to the housing requirement to be established by the emerging Local Plan. The Council has commenced work on a new Housing Strategy which is anticipated to be published in draft for consultation later in 2022. This will take into account the housing requirement proposed in the Updated PSVLP.
<ul style="list-style-type: none"> • The development needs resulting from the presumed levels of growth does not take account of development activity and opportunity in neighbouring authorities. 	<ul style="list-style-type: none"> • The Council has established its housing requirement working closely with neighbouring boroughs through the 'Duty to Cooperate'. This is evidenced in the Council's Statement of Common Ground.
<ul style="list-style-type: none"> • The ability of the Council to deliver the proposed level of housing is very much in doubt. Delivery rates have historically been lower than that proposed in the draft plan. 	<ul style="list-style-type: none"> • The Council considers the revised housing requirement is ambitious but achievable. The Council acknowledges the recent relatively low level of housing completions. When considered over a 20 year period, Warrington's average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council's housing target was only 380 per annum up to 2014. The Council's housing trajectory projects an increase

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	<p>in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will establish a housing land supply to support the Plan's housing requirement over the Plan period as a whole.</p>
<ul style="list-style-type: none"> • The Council has underestimated its brownfield capacity. Including brownfield sites such as Unilever, Bank Quay and the hospital which will all become available in the Plan Period could result in an additional 4,000 brownfield homes. 	<ul style="list-style-type: none"> • In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity, which was incorporated into the SHLAA. • Following consultation on the updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The Plan makes specific reference to the hospital site. The potential of other major brownfield sites such as the Unilever site have also been considered through the town centre master planning process. They are considered to provide potential additional development capacity, although there is insufficient certainty at present for these sites to be included within the Council's identified residential or employment land supply. These, together with other potential brownfield sites, are part of the reason why the Council does not consider it needs to remove land from the Green Belt for 'safeguarding' for development beyond the Plan period.

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	<ul style="list-style-type: none"> • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan. • The Local Plan contains policies which support bringing empty properties back into use and which support residential development in the town centre and other shopping centres, including vacant space above shops. The Council's Local Housing Needs Assessment has given consideration to the number of vacant properties in the borough.
<ul style="list-style-type: none"> • There is no connection between proposed job creation and the housing need. It is already the case that a large number of the recently built houses are occupied by people who commute into Manchester or Liverpool. There is therefore no particular logic to increasing the scale of housing in South Warrington simply to grow the commuter village, traffic problems and strain on public services that already exist. The jobs that are purported to be created from additional warehousing and logistics will be far less than proposed (due to automation over the timeline of the plan). Also the majority of people in the jobs that are created in south Warrington are unlikely to live in the immediate area given high house prices and will commute from lower priced locations elsewhere in Warrington and neighbouring boroughs, thereby adding further to traffic congestion. 	<ul style="list-style-type: none"> • The Council considers that the Plan's housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the borough. If the Plan was to provide for a lower number of homes then it is likely that this will result in increased commuting into the borough, increasing congestion on Warrington's transport network and risking worsening air quality on some of the busier transport corridors where people live. It is also likely to increase housing pressures in Warrington and in neighbouring authorities. The Plan proposes a range of housing types, including a substantial provision of affordable housing, to reflect to range of jobs that will be created in Warrington over the Plan period.
<ul style="list-style-type: none"> • There are widespread concerns that existing infrastructure is already over capacity and that new infrastructure will not be provided to support new homes. The Plan should be amended to allow staggered development over the Plan period to allow services time to identify and resolve infrastructure needs and to reduce risks of oversupply in delivering new housing. 	<ul style="list-style-type: none"> • The Plan is based on a detailed assessment of the Borough's existing infrastructure and the new and improved infrastructure required to support the proposed level of growth. The Plan has specific policy requirements to ensure that infrastructure improvements are coordinated with new development. This is also reflected in the Plan's stepped housing trajectory which proposes a lower level of development in the early years of the Plan to reflect the lead in times to deliver required infrastructure.

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<ul style="list-style-type: none"> • Density figures used in the plan should be reviewed to minimise the requirement for Green Belt release, including densities used in the wider urban area. Habitable rooms per hectare should be used as a measure of density rather than dwellings per hectare to avoid an over-concentration of small flats. 	<ul style="list-style-type: none"> • Following previous Local Plan consultations 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 and other sites that are in highly sustainable locations, together with minimum requirements for all site allocations. As such, the Council considers that the Plan's residential densities will optimise the use of land in accordance with the requirements of the NPPF and will help to ensure the amount of Green Belt release required to support Warrington's development needs is minimised. • The Council has used dwellings per hectare as the basis for assessing density to ensure the Plan's overall housing requirement is met. Policy DEV2 will ensure an appropriate balance of housing types and sizes to meet Warrington's needs.
<ul style="list-style-type: none"> • The Government requirement is for a Local Plan to last 15 years. Given the uncertainty of forecasting this far ahead, it is considered there is no need for the Plan period to be 18 years. This would reduce the number of houses required and in particular the number to be built on the Green Belt. 	<ul style="list-style-type: none"> • The Plan period is consistent with the NPPF which requires strategic policies to look ahead over a minimum 15 year period from adoption.
<ul style="list-style-type: none"> • The housing requirement of the Plan and individual allocations should be maximum not minimum, linked to infrastructure capacity. 	<ul style="list-style-type: none"> • The allocation policies are based on minimum capacities to ensure that best use is made of land allocated for development and that Green Belt release is minimised. The allocations are based on a detailed understanding of infrastructure capacity.
<ul style="list-style-type: none"> • An optional 10% flexibility uplift has been included which is unnecessary because the Plan has to be reviewed every five years. The standard allowance is 5% but in the face of developer demands for a 20% buffer, the Council has arbitrarily increased housing figure 'flexibility' to 10%. 	<ul style="list-style-type: none"> • 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. 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 flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Council has

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	reviewed the outcome of a number of recent Local Plan examinations in confirming this figure.
<ul style="list-style-type: none"> • This statement regarding deliverability and its review within the first 5 years is wholly contrary to the NPPF guidelines. It is no use taking the Green Belt and then deciding 5 years later that it was not a warranted decision. 	<ul style="list-style-type: none"> • The NPPF requires Councils to review policies in local plans to assess whether they need updating at least once every five years, and should then be updated as necessary (para 33). Policy DEV1 provides additional detail in this respect and identifies that one of the key changes which may necessitate an update to the Plan is in the event that the Council can no longer demonstrate either a 5 year deliverable housing land supply or a sufficient developable supply over the Plan period as a whole.
Landowner/Developer	
<ul style="list-style-type: none"> • The majority of developers object to the Plan’s housing requirement being reduced to the minimum housing need figure under the Government’s standard housing method. 	<ul style="list-style-type: none"> • The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the housing target in the previous PSVLP 2019. The Council is no longer proposing an additional uplift to the housing requirement, as was the case in the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID.
<ul style="list-style-type: none"> • The majority of developers consider that the housing requirement should be uplifted to ensure it will support the Warrington’s economic growth. There is a concern that the Council’s Local Housing Needs Assessment is aligned with a level of job growth that is well below what has been achieved in Warrington over recent years and which is inconsistent with the employment land target which will generate a level of job growth significantly in excess of the level that could be serviced by the increase in labour supply resulting from a housing requirement of 816 dpa. Developers also consider the Local Housing Needs Assessment has applied unrealistic assumptions around unemployment and economic 	<ul style="list-style-type: none"> • The previous PSVLP 2019 housing target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council’s economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 – in line with the Government’s housing methodology - will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.

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<p>activity rates which are boosting job growth without a commensurate increase in housing need.</p>	<ul style="list-style-type: none"> • It is not possible to align jobs targets, based on forecasts which also inform the Updated PSVLP housing target, with the employment land target, which is based on a forward projection of past take up. This is because businesses will seek to grow their operations, generating needs for premises and land, for a range of reasons, many of which are unrelated to the number of people they employ. • It is also not viable to project forward past jobs growth as a method of forecasting future employment growth and, from that, housing needs. Changing working practices and an evolving economy mean that employment trends of the future will differ from those of the past. • The Council's position is re-enforced through the EDNA Addendum (2022) prepared in response to key issues raised from the Updated PSVLP consultation. • The Council is therefore confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the target in the previous PSVLP 2019. The Council is also confident that it has correctly established its objectively assessed need for employment land and that overall the Plan provides a balanced strategy for meeting Warrington's future housing and employment land needs.
<ul style="list-style-type: none"> • The majority of developers raised the concern that affordable housing need will not be met as the Council has not applied an uplift to its overall housing target to meet increased affordable housing need, as expected by the NPPF. This is exacerbated with a large proportion of supply being located in the town centre and inner Warrington where the Council's own viability evidence identifies viability challenges around delivery of affordable housing. 	<ul style="list-style-type: none"> • In preparing the Updated PSVLP, the Council considered whether it should increase its housing target in order to increase the supply of affordable housing in accordance with the Government's Planning Practice Guidance. • It is considered totally unreasonable for the Council to deliver the full affordable housing requirement through its affordable housing policy applied to eligible market housing led developments. This would require the housing target to more than double and from the SA/SEA process and

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	<p>previous consultations it is apparent that this would result in unacceptable environmental harm and would be unrealistic in terms of delivery. The Council considered whether it should apply a smaller uplift to the headline housing target. However in reviewing the Plan's housing requirement, the Council has concerns about the realism of sustaining a higher level of housing growth over the Plan period and the additional Green Belt land which would need to be released. Further, a higher housing target could result in issues of market saturation and / or result in a higher level of out-commuting given the increase in working age population would be proportionally higher to the number of jobs forecast to be created over the Plan period.</p> <ul style="list-style-type: none"> • The PPG recognises that the need for particular groups, including those in need of affordable housing, may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method. From the LHNA it can be seen that a large proportion of the net affordable requirement is from existing households. Further, it is apparent that the increase in affordable housing need over time is primarily due to the reduction in re-lets from available properties, rather than an increase in gross affordable need. • The Council notes that the Government's standard method already includes an uplift above basic demographic need to address issues of affordability. By providing a flexibility in land supply and a longer term supply of homes beyond the Plan Period, there is also the potential for further delivery should the housing market be able to deliver at a higher rate. • Given concerns raised around viability, the Council has undertaken an addendum to its Local Plan Viability Assessment which demonstrates

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	<p>credible scenarios in more detail where affordable housing can be delivered in the town centre and in inner Warrington.</p> <ul style="list-style-type: none"> • There are also other sources of affordable housing supply, including developments by Registered Providers and the Council's Housing Company which are likely to deliver a much higher proportion of affordable housing. For example, Torus are bringing forward a number of affordable housing schemes in the Town Centre with grant funding from Homes England. Torus are also using grant funding to deliver additional affordable homes on private development sites, over and above those secured through S106. • Having carefully considered all these factors, the Council is therefore not proposing a further uplift to its proposed housing target of 816.
<ul style="list-style-type: none"> • A number of developers consider that the flexibility factor should be increased. This is due to what are considered to be: risks associated with the delivery of the large strategic sites; reliance on higher density development in the town centre, Inner Warrington and the Waterfront where the Council is reliant on the emergence and growth of a new residential market from a relatively low base position and where the Council's own evidence identifies there are viability challenges; and wider concerns regarding the deliverability of sites identified in the Council's SHLAA. 	<ul style="list-style-type: none"> • 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. 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 flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure. • Following consultation on the updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. This has resulted in a marginal decrease in urban capacity which is not material to the Plan's overall land supply position. The Council has also produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development

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	<p>across the borough, including those in the town centre and inner Warrington. As such the Council is confident that its stated land supply position is robust and there is no need to increase the flexibility factor.</p>
<ul style="list-style-type: none"> • The majority of developers consider that the Plan is based upon unduly optimistic assumptions about the delivery of a substantial number of homes on brownfield sites as set out through the SHLAA, with particular concerns raised regarding sites in the town centre and Inner Warrington, given the Council’s own viability assessment identifies significant viability challenges for these sites and whether higher density homes on these sites will meet Warrington’s needs for family homes. The Council has also been criticised for not updating its SHLAA for 2021 and not fully detailing its urban capacity calculation. 	<ul style="list-style-type: none"> • The NPPF requires the Council to make as much use as possible of suitable brownfield sites and underutilised land (para 141). To ensure it meets this requirement, in preparing the Updated PSVLP (2021), the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional masterplanning work in the town centre and surrounding area to identify additional brownfield capacity. This masterplanning work was incorporated into the SHLAA, enabling each site to be assessed in terms of availability and deliverability. • The Council acknowledges that it had not clearly identified all of the sites which formed its urban capacity figure. Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. This has resulted in a marginal decrease in urban capacity which is not material to the Plan’s overall land supply position. • The Council has also produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington. The Council is confident these sites will come forward and will compliment suburban and Green Belt release sites which together will provide a wide range of housing types to meet Warrington’s needs.

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<ul style="list-style-type: none"> There are concerns around a number of assumptions in the SHLAA - in respect of build rates, density, net site area and lead in times - which are considered too ambitious. Developers also do not believe there is sufficient evidence in the SHLAA that sites in the 5 year land supply without planning permission meet the more rigorous deliverability criteria set out in Annex 2 of the revised NPPF. 	<ul style="list-style-type: none"> The SHLAA and master planning work that the Council has undertaken was updated following the PDO consultation (2017) and the previous Proposed Submission Version Local Plan (2019) consultation, taking into account relevant representations. The capacities and build rates of the large sites are in the majority of cases informed by information provided by the developers of the sites in the first instance and only if it is not possible to obtain any details are the standard assumptions applied. The assumptions in the SHLAA (Build Rates; Lead-in-times; Densities etc) are based on local evidence and are re-appraised annually to ensure that they are up-to-date and take account of recent fluctuations in market conditions. Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF (including the deliverability criteria set out in Annex 2) and to update timescales for their delivery.
<ul style="list-style-type: none"> There is a concern from a Registered Provider that the densities sought in the town centre are not deliverable and many result in excessive land values, sterilising sites and pricing Registered Providers out of the market. 	<ul style="list-style-type: none"> Following consultation on the Updated PSVLP (2021), the Council has reviewed the density assumptions for all town centre sites over 0.25ha in updating the SHLAA and has made some minor adjustments. The Council considers the densities the Council has used provide the appropriate balance between making efficient use of land, ensuring a high quality living environment and ensuring deliverability of sites.
<ul style="list-style-type: none"> The majority of developers are suggesting that additional land will need to be released to address their concerns over what is considered to be an under estimate of housing need, an over reliance on urban capacity and a requirement for a greater flexibility factor. Reliance on a future review of the Local Plan is not considered a sufficient safeguard. A large number of sites put forward for allocation or potential safeguarding. 	<ul style="list-style-type: none"> The Council does not consider that any additional land needs to be removed from the Green Belt for housing allocations. If the Council was to increase the Plan's housing requirement and / or increase the flexibility factor and /or reduce reliance on urban capacity, then there is a high risk that the housing requirement will not be deliverable, that the Council would not be able to demonstrate that it has optimised the

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	capacity of the existing urban area and that excessive Green Belt land would be released. The review mechanism in the Plan provides an appropriate safeguard in the event that housing development does not come forward as envisaged in the Plan.
<ul style="list-style-type: none"> The majority of developers do not agree with the proposed stepped housing trajectory and argue that more medium sized sites should be allocated to bring more housing forward earlier in the plan period. Historic under delivery and 5 year housing land supply shortfall are given as further reasons for releasing additional sites for allocation or to identify 'reserve sites', to be brought forward in the Plan period in the event of non-delivery of committed sites and any other shortcomings in housing land supply. 	<ul style="list-style-type: none"> The Plan proposes a stepped trajectory as it is recognised that the Main Development Areas will have relatively long lead in times. This is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The Spatial Strategy already ensures additional small and medium sizes sites will come forward from the proposed Green Belt release in the outlying settlements and at Thelwall Heys early in the Plan Period in addition to the continued provision from existing sources in the wider urban area. The Council recognises a degree of risk associated with a large proportion of development being proposed within the Main Development Areas. This is reflected in the benchmark flexibility factor in the land supply of 10%.- roughly equivalent to the size of one of the large allocation sites– and the inclusion in the Plan of a review mechanism should housing land supply not be delivered in accordance with the planned trajectory. As such the Council does not considered there is any need to identify 'reserve' sites.
<ul style="list-style-type: none"> Developers promoting the previous allocation site in Burtonwood are strongly objecting to its removal. There is a wider concern from other developers that there are no allocations in Burtonwood 	<ul style="list-style-type: none"> The Burtonwood allocation site has been removed from the updated PSVLP given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This is not planned to come forward until later in St Helen's Plan period and the substantive work around infrastructure requirements and impacts has not been completed. Bold Forest Garden Suburb could have significant implications on the local highways network in Burtonwood. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
<ul style="list-style-type: none"> Developers promoting the previous South West Urban Extension are strongly objecting to its removal. 	<ul style="list-style-type: none"> Spatial options which included the South West Urban Extension were given extensive consideration through the SA/SEA and Local Plan Options

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	assessment process, taking into account representations made to the previous Regulation 19 consultation. Options including this urban extension did not perform as well as the chosen spatial strategy. In particular, the South West Urban Extension would not provide the brownfield regeneration benefits of Fiddlers Ferry or such wide ranging infrastructure benefits of the South East Warrington Urban Extension. The Council also has concerns about the potential impact of the South West Urban Extension on the Western Link.
<ul style="list-style-type: none"> • Developers promoting sites adjacent to the main urban area consider that additional homes can be sustainably accommodated in these areas. 	<ul style="list-style-type: none"> • The Council gave detailed consideration to all potential sites adjacent to the main urban area as part of its options assessment process. The vast majority of development within the Plan period will be located either within the existing urban area or through Green Belt release adjacent to the main urban area. The Council has considered a wide range of options for Green Belt release adjacent to the main urban area through the Local Plan process and is confident that the allocations in the Updated PSVLP will contribute to sustainably meeting Warrington’s development needs as part of the Plan’s wider spatial strategy.
<ul style="list-style-type: none"> • Developers promoting sites in the outlying settlements believe that the Plan does not properly consider the growth potential of the settlements and that they can accommodate further site allocations. 	<ul style="list-style-type: none"> • The Council considers that it has given detailed consideration to the growth potential of the outlying settlements through the options assessment process. The level of development proposed in the outlying settlements is considered to be appropriate in the context of the Plan’s overall spatial strategy. The level of development can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements and will not change the character of the respective settlements. Further allocations in the outlying settlements are not considered necessary to meet the Plan’s housing requirement and could have infrastructure and character impacts.
<ul style="list-style-type: none"> • A number of developers are concerned that sufficient flexibility has not been allowed for to ensure that Green Belt boundaries can endure beyond the current plan period. There is criticism of the Council’s 	<ul style="list-style-type: none"> • 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

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<p>approach to consideration of housing need beyond the Plan Period, which is considered to: underestimate future housing need; incorrectly offset the flexibility factor against future need; and is overly optimistic about future brownfield capacity. There is also criticism that the Council has not identified areas of safeguarded land.</p>	<p>household projections will be minimal. The Council also notes that the rate of increase in households is projected to decrease over the last 10 year period of the Plan. Given the rate of job growth is also forecast to decrease over time, the Council considers there will not be a requirement for any uplift in housing numbers to provide a balance with future jobs growth. In terms of land supply, the Local Plan is already providing for around 2,000 additional homes through the flexibility factor in its land requirement calculation. The proposed South East Warrington Urban Extension allocation in the draft Local Plan will provide for around 1,800 homes beyond the Plan period and Fiddlers Ferry will provide around 450 homes. The Council acknowledges that the availability of brownfield development sites is likely to decrease over time. Nevertheless, given likely advances in technology and development trends over the next 20 years, the Council considers it is likely there will be additional major brownfield development sites that will come forward beyond the Plan Period but cannot be accounted for at present. The Council therefore considers that there will be sufficient supply to meet the level of housing need for at least 12 years following the end of the Plan period. The Council is therefore confident that there is no need for any safeguarding of land to meet future residential need and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period.</p>
<ul style="list-style-type: none"> • Support from landowners promoting sites allocated within the Plan, although request to ensure consistency between minimum number of homes in DEV1 and the individual allocation policies. 	<ul style="list-style-type: none"> • The Council will ensure that any factual inconsistencies in the Plan are addressed through 'minor modifications' to be proposed through the EIP process.
Statutory Consultees	
<ul style="list-style-type: none"> • National Highways have stated that in addition to the proposed housing delivery within the existing main urban area of Warrington, the development of the South East Warrington Urban Extension (SEWUE) and Fiddler's Ferry (FF) sites are particularly of interest to National 	<ul style="list-style-type: none"> • Noted

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Highways due to expected impacts on the M56 / M6 interchange and M62 corridor respectively.	
Other	
<ul style="list-style-type: none"> The Homes Builders Federation (HBF) considers that a case can be made for an increased housing requirement given Warrington's strong economic outlook. There are concerns that the Plan is over-reliant on higher density development which many not meet local needs or market demands. HBF objects to the stepped requirement given the importance of meeting existing housing needs. 	<ul style="list-style-type: none"> The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the target in the previous PSVLP 2019. The Council is no longer proposing an additional uplift to the housing requirement, as was the case in the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID. The Council has updated its SHLAA to ensure the robustness of its housing land supply and prepared additional viability evidence to give greater consideration to higher density sites in the town centre and inner Warrington. The Council is confident these sites will come forward and will compliment suburban and Green Belt release sites which together will provide a wide range of housing types to meet Warrington's needs. The Plan proposes a stepped trajectory as it is recognised that the Main Development Areas will have relatively long lead in times. This is supported by the NPPG in such instances (Housing Supply and Delivery: para 021). The Spatial Strategy already ensures additional small and medium sizes sites will come forward from the proposed Green Belt release in the outlying settlements and at Thelwell Heys early in the Plan Period in addition to the continued provision from existing sources in the wider urban area. The Council recognises a degree of risk associated with a large proportion of development being proposed within the Main Development Areas. This is reflected in the benchmark flexibility factor in the land supply of 10%.- roughly equivalent to the size of one of the large allocation sites– and the inclusion in the Plan of a review

Policy DEV1 - Housing Delivery	
Summary of Issues Raised	Response
	mechanism should housing land supply not be delivered in accordance with the planned trajectory.
<ul style="list-style-type: none"> • CPRE welcomes the reduction in number of houses to 816 pa and the reduced Plan period, however only 468 dwellings per annum have been completed in Warrington over the last 3 years. Despite following the Government methodology, the housing requirement is flawed and does not reflect reality. The Council will be at risk of failing the Housing Delivery Test and not being able to demonstrate a 5 year housing land supply, putting rural land at risk. A reduced housing requirement would be more realistic and robust. • CPRE objects to loss of Green Belt, including sites in the outlying settlements and is concerned that the Council has not identified all brownfield sites and is not making best use of land with relatively low densities. CPRE recommends a minor modification to ensure a contribution of housing land from windfall and small sites is included in the 5-year housing supply in accordance with the NPPF. 	<ul style="list-style-type: none"> • The Council considers the revised housing requirement is ambitious but achievable. The Council acknowledges the recent relatively low level of housing completions. However, when considered over a 20 year period, Warrington’s average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council’s housing target was only 380 per annum up to 2014. The Council is also proposing a stepped housing requirement which will assist in ensuring that the Council is able to demonstrate a 5 year housing land supply throughout the Plan period. • The level of development proposed in the outlying settlements is considered to be appropriate in the context of the Plan’s overall spatial strategy. The level of development can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements and will not change the character of the respective settlements. • Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. The Council has also sought to apply densities which optimise the use of sites, taking into account viability and housing need. As part of this process the SHLAA includes a small sites allowance and this will form part of the Council’s 5 year land supply. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land.

Policy DEV1 - Housing Delivery	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Cheshire Wildlife Trust broadly supports the densities sought in Policy DEV1 (clauses 5 and 6), as they will help to achieve an efficient use of land. However, in some cases lower densities are needed to protect and/or achieve a net gain in biodiversity. Examples of where lower density is appropriate should be included in the Policy. 	<ul style="list-style-type: none"> Support noted. The Council considers that clause 6 in the Policy already provides the flexibility requested.
<ul style="list-style-type: none"> Rethinking South Warrington object to excessive housing and employment targets. Brownfield capacity has not been maximised and more capacity can be found in the town centre and other available sites such as Unilever. The housing requirement is in excess of past rates of delivery. Green Belt land should only be developed if absolutely necessary but the Plan does not provide flexibility in the event that land is not required. 	<ul style="list-style-type: none"> The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the target in the previous PSVLP 2019. The Council is no longer proposing an additional uplift to the housing requirement, as was the case with the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID. In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this was incorporated into the SHLAA. Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is

Policy DEV1 - Housing Delivery	
Summary of Issues Raised	Response
	<p>confident the Local Plan will maximise the amount of development that is possible on brownfield land.</p> <ul style="list-style-type: none"> • The potential of other major brownfield sites such as the Unilever site have also been considered through the town centre master planning process. They are considered to provide potential additional development capacity, although there is insufficient certainty at present for these sites to be included within the Council's identified residential or employment land supply. These, together with other potential brownfield sites, are part of the reason why the Council does not consider it needs to remove land from the Green Belt for 'safeguarding' for development beyond the Plan period. • The Council considers the revised housing requirement is ambitious but achievable. The Council acknowledges the recent relatively low level of housing completions. However, when considered over a 20 year period, Warrington's average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council's housing target was only 380 per annum up to 2014. The Council is also proposing a stepped housing requirement which will assist in ensuring that the Council is able to demonstrate a 5 year housing land supply throughout the Plan period. • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington's development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options.

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Not enough affordable housing is proposed. 	<ul style="list-style-type: none"> • The level of affordable housing proposed in Policy DEV2 has been informed by the Local Housing Needs Assessment (2021) which assesses in detail affordable housing need across the borough. This is also considered in the context of the Local Plan Viability Assessment (2021) which assesses whether the level of affordable housing proposed is viable and deliverable in different areas. On the basis of the evidence within the above documents, the Council is confident that the level of affordable housing proposed is appropriate to address the need identified over the plan period.
<ul style="list-style-type: none"> • Affordable housing in south Warrington will not be 'affordable'. 	<ul style="list-style-type: none"> • New development in south Warrington will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council's housing waiting list. A third will be for low cost home ownership, of which the majority will be 'First Homes' specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers. With regard to rents the Policy includes a safeguard that rents should not exceed the Local Housing Allowance rates. The Council therefore considers that draft Policy DEV2 will ensure that affordable housing is genuinely affordable in this regard.
<ul style="list-style-type: none"> • The demographic calculations are not correct and are based on out of date figures and incorrect assumptions for economic growth. 	<ul style="list-style-type: none"> • In determining Warrington's housing requirement, the Council has followed the Government's Standard Housing Methodology and associated Planning Practice Guidance, which requires the Council to use the ONS 2014 Household Projections as the starting point for calculating housing need. The Updated Proposed Submission Version Local Plan 2021 proposes a housing requirement of 816 homes per annum, in line with the minimum housing need figure under the Government's

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
	<p>methodology. This compares to a requirement of 945 per annum proposed in the Previous Proposed Submission Version Local Plan 2019.</p> <ul style="list-style-type: none"> • The previous 2019 Plan target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • Welcome the action of the Council to ensure that there are affordable homes in the town. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Urge the Council to increase the required percentage of affordable homes, both for rent and ownership in the plan. 	<ul style="list-style-type: none"> • The level of affordable housing proposed in Policy DEV2 has been informed by the Local Housing Needs Assessment (2021) which assesses in detail affordable housing need across the borough. This is also considered in the context of the Local Plan Viability Assessment which assesses whether the level of affordable housing proposed is viable and deliverable in different areas. On the basis of the evidence within the above documents, the Council is confident that the level of affordable housing proposed is appropriate to address the need identified over the plan period.
<ul style="list-style-type: none"> • There is likely to be a change in how housing needs are assessed and the plan should incorporate these changes before submission. 	<ul style="list-style-type: none"> • The Council has calculated housing need following the most up to date guidance available in the Planning Practice Guidance. The full analysis is provided in the Council's updated Local Housing Needs Assessment (2021).
<ul style="list-style-type: none"> • The plan misses an opportunity to provide more affordable homes in the town centre where there is likely to be more demand. 	<ul style="list-style-type: none"> • The lower affordable housing requirement on brownfield sites in the town centre and inner Warrington is based on viability. Brownfield sites normally have higher development costs due to remediation needs and

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
	building costs than outer suburban sites or greenfield sites. To ensure inner urban sites remain viable a lower proportion of affordable is considered necessary.
<ul style="list-style-type: none"> • Developers will not deliver the required 30% affordable housing. 	<ul style="list-style-type: none"> • The Council's Local Plan Viability Assessment 2021 has demonstrated that 30% affordable housing is deliverable outside of inner Warrington. The Council is therefore confident that it will secure affordable housing in line with its planning policy requirements. There may however be instances where site specific reasons provide genuine viability challenges and as such the Council may need to consider a lower level of affordable housing provision at the planning application stage.
<ul style="list-style-type: none"> • Concerns about affordability in South Warrington and suggestion that a more nuanced calculation is required looking at income data in order to ensure new properties are genuinely affordable. 	<ul style="list-style-type: none"> • The Council has assessed the need for affordable housing in accordance with the requirement of the NPPF and associated Planning Practice Guidance. In the updated LHNA (2021), income is taken into consideration in establishing the need for different affordable tenures. This is then reflected in the requirements of Policy DEV2 to secure affordable housing and ensure its affordability to those in need. • Draft Policy DEV2 recognises specific issues of affordability in South Warrington and seeks to impose 40% discount on market values for First Homes. Affordable rent will be in accordance with the Government's rent policy for Social Rent or Affordable Rent which requires that rent is at least 20% below local market rent. In recognition this may be an issue in higher value areas, the policy includes the added safeguard that rents cannot exceed Local Housing Allowance rates. • If discount market housing is justified as an alternative, the Council will require the discount to be to a level that is affordable for those households in an area who are currently renting and are unable to afford to buy a home. This will be calculated using lower quartile private rents across the Borough, assuming rent accounts for 25% of household income.

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The plan includes no viable funding mechanism to deliver social homes for rent. 	<ul style="list-style-type: none"> • Affordable homes will be secured through legal agreements which will ensure the homes are delivered as affordable in accordance with the requirements of the policy. The Council is not able to require all rented homes at social rents given this will raise significant viability issues. The policy includes the added safeguard that rents cannot exceed Local Housing Allowance rates. In addition, social rented housing may come forward through Registered Provider schemes.
<ul style="list-style-type: none"> • Concerns about lack of affordable homes in Lymm. 	<ul style="list-style-type: none"> • Housing developments in Lymm of ten dwellings or more will be required to provide 30% affordable housing. Provisions have been made in the plan for addressing higher values in the south of the Borough and ensuring that affordable homes in these locations are genuinely affordable. • Draft Policy DEV2 recognises specific issues of affordability in South Warrington and seeks to impose 40% discount on market values for First Homes. Affordable rent will be in accordance with the Government's rent policy for Social Rent or Affordable Rent which requires that rent is at least 20% below local market rent. In recognition this may be an issue in higher value areas, the policy includes the added safeguard that rents cannot exceed Local Housing Allowance rates.
<ul style="list-style-type: none"> • The plan offers no guarantees that the houses that are delivered will be of the type and value required by the market. 	<ul style="list-style-type: none"> • The Local Housing Needs Assessment (2021) provides evidence of affordability, market values and the types and tenures of properties in demand across the Borough. The Council is confident that draft Policy DEV2 reflects this evidence.
<ul style="list-style-type: none"> • Lack of clarity as to how 20% of development is to be delivered for older people. 	<ul style="list-style-type: none"> • The Updated Proposed Submission Version Local Plan 2021 requires all major housing sites to provide housing for older people but the 20% target that was in the previous 2019 version of the Plan has been removed. This is in recognition of the fact that housing for elderly may be delivered through a range of means and the Council is open to dialogue on this on a site-by-site basis.
Landowner/Developer and the HBF	

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • General support for the provision of affordable and specialist housing across the borough. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Concerns regarding viability and delivery of affordable housing as the Local Plan Viability Assessment highlights issues with affordability for some typologies and site allocations, in particular those in the town centre and in inner Warrington. 	<ul style="list-style-type: none"> • Draft Policy DEV2 sets out the approach to delivering affordable housing across the Borough, recognising potential viability issues in the town centre and inner Warrington. The Local Plan Viability Assessment 2021 has demonstrated that in broad terms the level of affordable housing sought is viable and deliverable. As draft Policy DEV2 specifies, where an applicant/developer seeks to vary from this requirement, a detailed viability assessment will need to be presented to the Council at the planning application stage. • Given concerns raised around viability, the Council has undertaken an addendum to its Local Plan Viability Assessment which demonstrates credible scenarios in more detail where affordable housing can be delivered in the town centre and in inner Warrington.
<ul style="list-style-type: none"> • Nationally Described Space Standards are intended to be optional. The Council cannot provide evidence to support the need for these optional standards and as such this part of the policy should be deleted. 	<ul style="list-style-type: none"> • The Council intends to use Nationally Described Space Standards as a benchmark and as the draft policy states, will seek to implement these and champion good design principles in all new development. Where an applicant considers these standards are not appropriate they are able to put this case to the Council for consideration at the planning application stage.
<ul style="list-style-type: none"> • Lack of evidence to support the requirement for higher standards for accessible and adaptable homes. 	<ul style="list-style-type: none"> • The Council has prepared its LHNA and justified the associated policy requirements for accessibility standards, in accordance with the requirements of the NPPF and associated Planning Practice Guidance. The updated Proposed Submission Version Local Plan is seeking all homes to meet standard M4(2) (accessible and adaptable dwellings) with 10% required to meet standard M4(3) (wheelchair user dwellings). This is subject to viability and technical feasibility considerations. The Council has ensured that the costs of meeting these standards have been accounted for in the Local Plan Viability Assessment.

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Updated Proposed Submission Version Local Plan 2021 requires all major housing sites to provide housing for older people but has removed the 20% target that was included in the Previous PSVLP 2019.
<ul style="list-style-type: none"> • Concern regarding the inclusion of custom and self-build plots within individual site allocations. This complicates delivery and may cause delays. 	<ul style="list-style-type: none"> • The requirement for custom and self-build plots as part of individual site allocations is subject to demand on the Council's register. The Council considers that this is the best way to ensure that these needs are met, as opposed to identifying specific sites solely for this purpose, and importantly will encouraged mixed design themes and inclusive communities.
<ul style="list-style-type: none"> • Too much reliance upon delivery of homes in the town centre where there are likely to be viability and deliverability issues. The Council should increase the allocation of sites for family housing elsewhere. 	<ul style="list-style-type: none"> • The regeneration of the town centre and inner Warrington, and indeed maximising development within the existing urban area, is a key objective of the Updated PSVLP 2021 in order that it is sustainable and minimises the need for Green Belt release. It is recognised that viability may be an issue in some inner areas and this is addressed within draft Policy DEV2 in terms of the requirement for affordable housing being lower here. A key driver of town centre regeneration is the creation of a larger more sustainable residential population and so it is considered essential to seek to maximise the delivery of new homes in this location. The Council considers that in addition to these homes, there are sufficient sites being allocated outside of these inner areas to deliver the mix of housing required over the plan period and that further site allocations are not necessary.
<ul style="list-style-type: none"> • The requirement for housing for the elderly to be included in major developments is not justified, is too vague and could impact upon viability. Specific sites should instead be allocated for this type of accommodation. 	<ul style="list-style-type: none"> • The Updated Proposed Submission Version Local Plan 2021 requires all major housing sites to provide housing for older people but the 20% target that was in the previous 2019 version of the Plan has been removed. This is in recognition of the fact that housing for elderly may be delivered through a range of means and the Council is open to dialogue on this on a site-by-site basis.

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Council considers that delivery of homes for this growing proportion of the population should be included in all major developments rather than only through specific allocations for older persons' housing.
<ul style="list-style-type: none"> • Concern about the Local Housing Allowance cap on affordable rents. Support for the requirement for rents to be set at an affordable level however there will be some parts of the Borough where this could test viability and could potentially deem what could have been a 100% affordable scheme undeliverable. 	<ul style="list-style-type: none"> • It is important that affordable housing provided in Warrington is genuinely affordable for those in housing need. The plan does provide flexibility in the event that an applicant can demonstrate legitimate viability issues at the planning application stage.
<ul style="list-style-type: none"> • Challenge the specific policy requirement for First Homes to be a minimum of 30% discount against market value, increasing to 40% south of the Ship Canal – viability must be considered on a site by site basis and as such this policy is too prescriptive. 	<ul style="list-style-type: none"> • Affordability in south Warrington is a key issue as documented in the Council's evidence base and as raised by key stakeholders and local residents. The Council has therefore concluded that the standard 30% discount on market value would not represent an affordable option for local people and - in line with Planning Practice Guidance which states that discretion is given to the local planning authority to apply a higher discount of 40% or 50% if they can demonstrate a need for this – it is considered appropriate in areas south of the Ship Canal to apply a minimum of 40% discount. This has been taken into account in the Local Plan Viability Assessment 2021. The Council is aware that other parts of the borough experience similar affordability issues and this will be kept under review.
<ul style="list-style-type: none"> • It is difficult to understand the implications of the requirement for First Homes on the provision of other affordable products such as shared ownership, rent to buy and affordable rent. 	<ul style="list-style-type: none"> • The requirement for the provision of First Homes is set out in Government Planning Guidance. The policy treats First Homes as falling under affordable home ownership.
<ul style="list-style-type: none"> • Further clarification is required as to what 'genuinely affordable' discount market housing means. 	<ul style="list-style-type: none"> • Details of how the Council expects discount market housing to be genuinely affordable is provided in the justification text to Policy DEV2 at paragraph 4.1.42. This sets out that the Council will require the discount to be to a level that is affordable for those households in an area who are currently renting and are unable to afford to buy a home. This should be calculated using lower quartile private rents across the Borough, assuming rent accounts for 25% of household income.

Policy DEV2 - Meeting Warrington's Housing Needs	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Concern regarding the housing mix target provided on a Borough wide level. This must be considered on a site by site basis. 	<ul style="list-style-type: none"> • As set out in the justification to draft Policy MD2, the breakdown of housing mix identified is a Borough-wide monitoring target. The precise mix should be determined on a site by site basis, taking in account the sub-borough analysis which is contained in the Council's most up to date Local Housing Needs Assessment.
<ul style="list-style-type: none"> • A nil affordable housing target should be set for sheltered and extra care development. 	<ul style="list-style-type: none"> • Based on the Council's evidence base, it has been concluded that affordability issues prevail within the elderly population. For this reason it is appropriate to ensure that affordable units are provided in those developments which consist of self-contained living accommodation such as sheltered accommodation. It is recognised that this would not be appropriate in more communal living settings such as an extra care setting. • The Council has now specifically considered the viability of sheltered housing schemes in the addendum to the Local Plan Viability Assessment.
<ul style="list-style-type: none"> • Requirement for appropriate outdoor amenity space is too vague and must be more precise and based on proportionate evidence. 	<ul style="list-style-type: none"> • Outdoor amenity space is considered an essential part of any well designed living space. The Council seeks to recognise this through draft Policy DEV2 whilst leaving some flexibility as to how this will be delivered on a site-by-site basis.
<ul style="list-style-type: none"> • Support for requirement to meet accessibility standards. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Support for the more flexible approach to provision of housing for older people. 	<ul style="list-style-type: none"> • Support noted.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	
Other	
<ul style="list-style-type: none"> • CPRE – Agree that more genuinely affordable homes are needed in the Borough. 	<ul style="list-style-type: none"> • Agreement noted. The Council is confident that Policy DEV2 will ensure that genuinely affordable homes are delivered over the plan period.

Policy DEV3 - Gypsy & Traveller and Travelling Showpeople Provision	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • South Warrington Parish Councils (Lymm, Grappenhall and Thelwall, Appleton, Stretton, Hatton and Walton) - Impact of recent approvals should be assessed relative to need. The plan needs to be clear in terms of location and avoid imposing this form of development in an unplanned manner. 	<ul style="list-style-type: none"> • Policy DEV3 takes account of all of the recent planning approvals and identifies the most up to date position in terms of Gypsy & Traveller and Travelling Showpeople provision. • Policy DEV3 sets out the criteria against which any proposals for new sites will be assessed.
Landowner/Developer	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England supports Policy DEV3 as it ensures that any proposals will safeguard the historic environment of Warrington and accords with the requirements of the NPPF including paragraphs 8, 11a, 20 and 190 including the need for consideration of other relevant policies within the Plan, such as those covering the historic environment. 	<ul style="list-style-type: none"> • Support noted.
Other	
<ul style="list-style-type: none"> • CPRE supports the provision of enough land to accommodate the needs of this community. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Stretton NDP - South Warrington already has a large number of privately-owned permanent gypsy or traveller and show people sites, some of these are within the village of Stretton. WBC should not permit any further applications for such sites within Stretton if permanent provision is to be made elsewhere within any Garden Suburb. Any such permanent site needs to be located away from the main residential areas and with discrete green buffered boundary treatment. Provision should not be made for the travelling community in Stretton or the wider Garden Suburb. 	<ul style="list-style-type: none"> • The Policy DEV3 sets out the criteria against which any proposals for new sites will be assessed. • The need for a permanent site in the SEWUE (formerly the Garden Suburb) was removed from Policy DEV3 and the site allocation policy MD2 in the Updated PSVLP 2021.

Policy DEV4 - Economic Growth and Development (including EDNA)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Does not meet the needs of the area as based on employment land requirements which use past Omega development to achieve higher than needed annual land supply, rather than a more realistic forward jobs requirement. 	<ul style="list-style-type: none"> The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations. The Council has assessed historic land take including and excluding Omega, given it accounts for a large proportion of recent land take and fulfils a strategic function. The Council considers that the land supply need taking into account Omega better reflects the full range of need the Borough will face over the next 18 years.
<ul style="list-style-type: none"> In reaching its conclusions, the EDNA pays lip service to the most recent trends, which show a notable decline in demand/take-up. Noting the clear downward trend and economic forecasts, the evidence presented is insufficient to support the level of employment area land recommended to be set aside, particularly since the majority is currently Green Belt land, which is protected anyway (and therefore does not need reserving as an employment area). The Strategic/Local Take-up model should therefore be discounted. 	<ul style="list-style-type: none"> The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations.
<ul style="list-style-type: none"> Lack of evidence to support anticipated number of jobs to be created and the Council's economic growth forecasts are based on levels of activity and development at rates which appear to be unachievable, especially given the impact of Covid 19 on the downturn of economic growth across the country in general. 	<ul style="list-style-type: none"> The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021) which uses data which post-dates the EU Brexit referendum and takes into account the impact of Covid-19. The Council is therefore confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations.
<ul style="list-style-type: none"> Too much Green Belt land being released for employment development. 	<ul style="list-style-type: none"> The release of Green Belt land is necessary to meet the employment land needs of Warrington over the plan period up to 2038. The Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. The Council has

Policy DEV4 - Economic Growth and Development (including EDNA)	
Summary of Issues Raised	Response
	demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites.
<ul style="list-style-type: none"> • The types of jobs being promoted in the Logistics and Distribution sector needs to be diversified to include employment opportunities outside of these sectors. 	<ul style="list-style-type: none"> • Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the Town Centre and Inner Warrington and supporting employment in other established employment locations including Birchwood Park.
<ul style="list-style-type: none"> • Additional housing and new economic activity areas should be mutually supportive. This does not appear to be the case between the current SEWUE proposals and the proposal to release Greenbelt land for this specific Economic Development Area. The cost of new housing in the SEWUE will not be affordable for warehouse and distribution jobs holders. 	<ul style="list-style-type: none"> • The Council considers that the Plan's housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the Borough. New development in south Warrington will be required to provide 30% affordable housing. Policy DEV2 contains specific safeguards to ensure that this housing genuinely affordable in higher value parts of the Borough, including south Warrington. • The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling and this is a requirement of the employment allocation policies in the Plan.
<ul style="list-style-type: none"> • It is difficult to see how such a proposal to create an Economic Development Area on Greenbelt land could possibly satisfy the criteria of 'exceptional circumstances'. 	<ul style="list-style-type: none"> • The release of Green Belt land is necessary to meet the employment land needs of Warrington over the plan period up to 2038. The Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the Updated PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt.

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	<ul style="list-style-type: none"> • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites, including the South East Warrington Employment Area. It is considered that this allocation will make a significant and sustainable contribution towards meeting Warrington's current and long term employment development needs.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • Releasing land in strongly performing Green Belt in this area is not sustainable, workers will use their own vehicles to commute to this location. Being next to a motorway junction is not sufficient to make it sustainable. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt. • The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling and this is a requirement of the employment allocation policies in the Plan.
<ul style="list-style-type: none"> • The Stobart's application was refused on Green Belt grounds. 	<ul style="list-style-type: none"> • Part of the allocation (the Stobart's site) has been the subject of a planning application appeal, with the appeal subsequently being rejected by the Government. However, the test for acceptable development in the Green Belt by way of a planning application is demonstrating that Very Special Circumstances exist to warrant the granting of planning permission. The test for removal of land from the Green Belt through the Local Plan process to meet identified development needs, is demonstrating that Exceptional Circumstances exist. • Having assessed Warrington's future employment land needs, the Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. The Council has demonstrated that Exceptional Circumstances exist for the principle of Green Belt release in Warrington and for each of the

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	individual allocation sites, including the South East Warrington Employment Area. It is considered that this allocation will make a significant and sustainable contribution towards meeting Warrington's current and long term employment development needs.
<ul style="list-style-type: none"> • Allocation MD6 overrides Green Belt considerations even when Green Belt is considered to strongly meet Green Belt functions. 	<ul style="list-style-type: none"> • Having assessed Warrington's future employment land needs, the Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. • The Council's Green Belt Assessment concluded that at a General Area level, this area makes a weak contribution to Green Belt purposes. At parcel levels, the site makes strong, weak and moderate contributions to Green Belt purposes. • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. The relative performance of Green Belt land was considered as part of that process. It is considered that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt. The Council has demonstrated that Exceptional Circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites, including the South East Warrington Employment Area. It is considered that this allocation will make a significant and sustainable contribution towards meeting Warrington's current and long term employment development needs. • The Council has also demonstrated that the allocation will not compromise the function of remaining Green Belt in south east Warrington in the 'Implications of Green Belt Release' Report (2021) prepared in support of the Updated PSVLP 2021.
<ul style="list-style-type: none"> • Allocation MD6 stimulated by developer pressure and will be developed speculatively. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The amount of land being

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	<p>proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations, which concludes there is a need for 316ha of employment land across the Plan period. The Council is confident that the Plan's employment allocations, including MD6, will be completed by the end of the Plan Period.</p>
<ul style="list-style-type: none"> • Full examination of development options has not been undertaken, for example neighbouring authorities. 	<ul style="list-style-type: none"> • Warrington needs to plan for its own economic development land needs, whilst considering and understanding how the sub-regional economy operates. The Council's EDNA (2021) provides analysis of Warrington's wider economic geography in establishing Warrington employment land needs. The Council has also worked closely with neighbouring authorities who form part of the wider economic sub-region as part of the Local Plan Duty to Co-operate process to ensure consistency in the preparation of Local Plan and that strategic issues are appropriately addressed.
<ul style="list-style-type: none"> • Policy makes no specific reference to the breakdown of employment uses. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). This evidence has been used to underpin the relevant policies in the Updated PSVLP. This includes consideration of a range of employment uses and is reflected in Policy DEV4, which provides guidance on the locations for E Use Class and B Use Class employment uses and in the employment allocation policies.
<ul style="list-style-type: none"> • Development of a logistics based employment use that fails to provide scope for access to rail or water should be resisted. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of development to meet employment land needs. The Council considers that the areas of Green Belt release proposed in the PSVLP (2021), along with the existing urban area supply, provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy. • The Council did consider allocations at Port Warrington and to the south of Birchwood Station which could provide links to the rail and waterway networks. However, these sites currently have significant constraints relating to access and deliverability.

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	<ul style="list-style-type: none"> The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. By this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> The refresh of the EDNA was published simultaneously with the PSVLP, has the EDNA properly been considered? Many sites for growth are already in developers ownership, the view is that this is giving a supply led approach. 	<ul style="list-style-type: none"> The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). This evidence has been considered by Officers and used to underpin the relevant policies in the Updated PSVLP. Whilst some sites might well be already under the ownership of developers, the Council does not concur that it results in a 'supply led approach' to development. The amount of land being proposed for employment uses in the updated PSVLP 2021, is based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> General support of the policy and for the level of assessed need for employment land from developers whose land is proposed to be allocated for employment development. 	<ul style="list-style-type: none"> Support noted
<ul style="list-style-type: none"> The owner of the Omega allocation is supportive of Site 1EA (Omega extension) of St Helens Council Local Plan counting towards meeting Warrington's employment land need. As this site now has the benefit of planning permission and will count towards Warrington's need, Policy DEV4 and supporting text of the Plan should be updated. Policy should also make reference to the strategic importance of the cross-boundary travel to work areas that exists in the sub-region due to the likes of Omega and the Parkside development. 	<ul style="list-style-type: none"> Support Noted The Council may propose to make factual amendments through 'minor modifications' to ensure the Plan is fully up to date ahead of adoption.

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<ul style="list-style-type: none"> • A number of developers consider the Council has underestimated its employment land needs. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations.
<ul style="list-style-type: none"> • Employment land requirements need to be expressed as an “at least” figure or a “minimum need” figure and should comprise a larger 5 year buffer and a trajectory should be provided to show delivery rates. 	<ul style="list-style-type: none"> • The Policy as written confirms the Council will meet its objectively assessed development needs within the Plan Period and confirms the Council’s commitment to undertake a review into Warrington’s employment land needs before the end of the Plan period to ensure the long term supply of employment land. • The EDNA (2021) and the EDNA addendum (2022) the Council has prepared following the consultation provide detailed justification for the use of a 3 year buffer in establishing Warrington’s objectively assessed need for employment land. • There is no requirement in national planning policy for the Council to set out the rates of delivery in an employment land trajectory as part of the Local Plan process.
<ul style="list-style-type: none"> • There is no reason why the Borough’s employment land needs (including the identified shortfall of 8 ha) cannot be met within the Plan Period through further Green Belt release. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington’s employment development needs as part of the Plan’s overall Spatial Strategy, whilst ensuring the long term integrity of Warrington’s Green Belt. • The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period, and compensating for some losses of employment land to other uses. • The Council has considered a number of other employment sites, in particular those which were given the highest grading through the

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	<p>Economic Development Needs Assessment. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.</p> <ul style="list-style-type: none"> • It should also be noted that the western extension of Omega in the Borough of St Helens has been now been approved at Inquiry, and the additional consented land could make a contribution to meeting Warrington's employment land needs, over and above the 31.22ha already agreed through the Duty to Cooperate process. However, the apportionment of the additional land has not yet been agreed. This will be agreed with St Helens through the Duty to Cooperate process.
<ul style="list-style-type: none"> • Object to the Omega west extension (including any additional land if granted planning permission) in St Helens counting towards Warrington's employment land needs when other sites within the Borough are available to meet need. 	<ul style="list-style-type: none"> • The Council has agreed through the Duty to Cooperate process that the western 31.22 hectare extension of Omega on land to the south of the M62 in St Helens, as defined in the St Helens Submission Version Local Plan (site 1EA, land north of Finches Plantation, Bold), will contribute to meeting Warrington's employment land needs. This is because the St Helens allocation is effectively extending the existing Omega employment location in Warrington, with access to the site exclusively from Warrington's highways network. • It is noted that additional employment land will now come forward at Omega West, following the decision of the Secretary of State in November 2021 to grant permission for a 75 ha development. The additional consented land could make a contribution to meeting Warrington's employment land needs, over and above the 31.22ha

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	<p>already agreed through the Duty to Cooperate process. However, to date, no agreement has been reached on which Borough's need this additional land will contribute to. This will be agreed through further discussions between Warrington and St Helens through the Duty to Cooperate.</p>
<ul style="list-style-type: none"> • Safeguarded land has not been identified within the Plan for employment development. There is a need to identify safeguarded land to meet development beyond the Plan period and to ensure Warrington's revised Green Belt boundaries will be capable of enduring over the long term. 	<ul style="list-style-type: none"> • The proposed allocations at Fiddlers Ferry and the South East Warrington Employment Area provide a total of 237.92 ha, which is marginally below the required need by around 8 ha. The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in existing employment locations. The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. • The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • Warrington should not be relying on only two substantial allocated sites to meet employment land needs over the Plan period, as any issues in respect of delivery will result in a major shortfall of employment land during the Plan period. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt.

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	<ul style="list-style-type: none"> • In the event there is a problem with employment land supply during the Plan period, then the Council will address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review.
<ul style="list-style-type: none"> • Fiddlers Ferry allocation is constrained and may not come forward as anticipated. This could leave a shortfall of some 100 plus hectares of employment land. 	<ul style="list-style-type: none"> • The site is available and is being actively promoted by site owners through the Local Plan process for development. In terms of achievability, the site promoter has provided extensive evidence to demonstrate that the demolition and remediation of the power station is technical achievable and viable, subject to the enabling residential development, and that this would enable the employment site to be developed in full within the Plan Period and provide wider contributions to required transport and social infrastructure. • The Council has also confirmed the viability of the development through the Local Plan Viability Assessment.
<ul style="list-style-type: none"> • The Council needs to demonstrate it has had regard to land uses adjoining the Fiddlers Ferry site and in particular the location of the adjacent COMAH designation and build in specific policy provisions in this regard. 	<ul style="list-style-type: none"> • The Council has taken into account all COMAH designations in its site assessment process and in preparing Policy MD3. The Council considers that specific reference to the COMAH site is not required within the policy wording.
<ul style="list-style-type: none"> • The South East Warrington Employment Area has become isolated with the removal of the Garden Suburb allocation. 	<ul style="list-style-type: none"> • The UPSVLP closely reflects the Council's Local Transport Plan (LTP4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan's Spatial Strategy and that the Main Development Areas, including the South East Warrington Employment Area. • The allocation policy for the South East Warrington Employment Area in the UPSVLP includes a range of measures to promote active transport, including walking and cycling, and improvements to public transport serving the allocation and surrounding area.
<ul style="list-style-type: none"> • Developer considers that given the shortfall in meeting employment land requirements over the Plan period that land at Statham Meadows should be allocated to meet development needs, with the site also having the potential to be used for a Motorway Service Station. Notwithstanding 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs and has given considered to land at Statham Meadows. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most

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<p>this, the site is not included in the Council’s Site Assessment Proformas Report (2019) nor is it considered in the Council’s 2021 update. The Council has therefore not taken account of this development opportunity, and appraised this alongside others as part of the Local Plan process. It is requested that the site is assessed as part of an update to the Council’s Site Assessment Report to enable it to be considered on a comparative basis and in the context of the increased employment land required.</p>	<p>sustainable way of meetings Warrington’s employment development needs as part of the Plan’s overall Spatial Strategy, whilst ensuring the long term integrity of Warrington’s Green Belt.</p> <ul style="list-style-type: none"> • The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period, and compensating for some losses of employment land to other uses. • It should also be noted that the western extension of Omega in the Borough of St Helens has been now been approved at Inquiry, and the additional consented land could make a contribution to meeting Warrington’s employment land needs, over and above the 31.22ha already agreed through the Duty to Cooperate process. However, the apportionment of the additional land has not yet been agreed and. This will be discussed with St Helens through the Duty to Cooperate process.
<ul style="list-style-type: none"> • Developer promoting Port Warrington considers that Port Warrington (in line with Par. 106 NPPF 2021) is the only type of this development that can meet the specific needs for, not only Port related development, but also multi modal development that would remove vehicular movements from the Borough’s roads. The draft Plan therefore fails to address these needs and benefits and Port Warrington should be reinstated in the Plan as an employment allocation as it provides benefits to the North West region with large population centres in close proximity. 	<ul style="list-style-type: none"> • The Council has given detailed consideration to the proposed expansion of Port Warrington and it performed strongly in terms of its benefits as an employment location in the EDNA (2021) • Port Warrington was proposed to be allocated in the previous PSVLP 2019, but extending the Port will result in loss of part of Moore Nature Reserve and there are significant concerns regarding the potential impact on the Western Link. In particular, to mitigate the impact on the Western Link it is likely that significant additional capacity will need to be provided at the junctions of the Western Link and the A57 and the A56. The scale of improvements required to these junctions is likely to raise significant engineering, deliverability and viability issues. • The Council is however committed to undertaking a review into Warrington’s employment land needs before the end of the Plan period to ensure the long term supply of employment land. By this stage, it is likely that key infrastructure improvements, including the Western Link

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	and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • Developer promoting land at South Station Place -Birchwood strongly objects to DEV4. Given the reliance on two substantial allocation sites to meet need, request that an additional site-land at South Station Place Birchwood, be allocated to ensure Warrington's employment land needs are met. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meetings Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt. • The Council has reviewed the information submitted by the developer but is of the opinion that at this stage, land to the south of Birchwood Station is also an unreasonable option for employment development. The developer has carried out some provisional investigation into underlying peat, but the Council's ecological consultants do not think this is sufficient to overcome what would likely to be a significant objection from Natural England. Further, whilst the council agrees there are long term benefits in terms of access to the station and potential improvements to the station including a new park and ride facility, the developer has not submitted any detailed proposals in terms and viability and deliverability. Further, the daytime frequency of rail services on the Warrington to Manchester / Liverpool line ,including and in particular at Birchwood Station, is planned to be reduced from December 2022 as part of Network Rail's Manchester Rail Recovery Taskforce programme. Therefore, whilst the principle of station improvements is supported by Network Rail and the Rail Delivery Group, and the council continues to lobby hard for further enhancements, the Council is concerned at this stage, that the committed service levels from December 2022 are unlikely to support the business case for the station improvements and park and ride facility proposed, and insufficient evidence has been produced by the developer to indicate otherwise. As such, the Council

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	will consider land south of Birchwood as part of any future review of employment land in accordance with Policy DEV4 of the UPSVLP.
<ul style="list-style-type: none"> • Developer promoting Six56 Phase II suggest that it should be removed from the Green Belt and safeguarded for long term employment development needs, as safeguarded land has not been identified in the UPSVLP. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington’s employment development needs as part of the Plan’s overall Spatial Strategy, whilst ensuring the long term integrity of Warrington’s Green Belt. • The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period, and compensating for some losses of employment land to other uses. • The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment, including Six56 Phase II. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington’s employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised. • It should also be noted that the western extension of Omega in the Borough of St Helens has been now been approved at Inquiry, and the additional consented land could make a contribution to meeting

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	Warrington's employment land needs, over and above the 31.22ha already agreed through the Duty to Cooperate process.
<ul style="list-style-type: none"> • Developer promoting a site at Kenyon Lane Junction (R18/P2/033) considers that the site should have been reappraised as part of the updated Regulation 19 Local Plan and allocated for employment development, but this has never happened. Despite being in the Green Belt, the site is clearly brownfield land and the Council has therefore failed to demonstrate that all brownfield sites have been exhausted before releasing Green Belt land for development. The Council should be compelled to revisit its evidence base and reassess brownfield sites, a step that has been mandated by the inspector in the Calderdale Local Plan examination. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt.
<ul style="list-style-type: none"> • A developer promoting a sites at Joy Lane, immediately to the north of the existing Omega employment location considers that their site should be allocated for employment development. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt. • The Council has previously given consideration to the site at Joy Lane which could provide a modest extension to Omega north and has been graded as a 'B -' site' in the EDNA. The site was not allocated in the previous PSVLP due to concerns around concerns the ability of the site to deliver the required infrastructure improvements to the local and strategic road networks. The Council does not consider there has been any change in circumstance to change its previous conclusions in respect of this site.
<ul style="list-style-type: none"> • A developer promoting land at J21 of the M6 considers that their site should be allocated for employment development. Detailed evidence has been submitted to demonstrate that the site would meet an identified 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment

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<p>need for employment development and that the development of the site is deliverable.</p>	<p>development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt.</p> <ul style="list-style-type: none"> • The Council has given detailed consideration to the allocation of land at J21 of the M6, given the relatively strong performance of the site through the EDNA grading and that this site is not impacted to the same extent in respect of peat resources as land being promoted immediately to the south of Birchwood station. Nevertheless, the Council does not consider this site performs as well as Fiddlers Ferry and the South East Warrington Employment area, given its strong Green Belt performance and concerns regarding intervening landownership which could place limitations on the scale and location of employment that could be developed on the site. • The Council will however consider this site as part of any future review of employment land in accordance with Policy DEV4 of the Updated PSVLP (2021).
<ul style="list-style-type: none"> • A developer, based on historic under supply and the delivery of key sites, considers that the employment land figure should be increased to 350 hectares and land at J9 M62/A49 should be allocated to meet the additional employment land needs. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations. • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt.
<ul style="list-style-type: none"> • The tests set out at sub-section 9 of the policy are robust tests, there to ensure that any alternative development proposals within employment areas will not undermine the employment objectives of the local plan. If a use is deemed acceptable then there should be no further policy test to satisfy, as set out in sub section 10. 	<ul style="list-style-type: none"> • The Council considers the requirement at sub-section 10 is justified given the scale of the Borough's employment land requirement.

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Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The UPSVLP confirms that the Town Centre will provide the main location for new Class E Office development yet demand for such development in this location is low. It is high in peripheral locations well located close to the junctions on the sub-regional motorway network. As such this element of the wider delivery strategy will fail. 	<ul style="list-style-type: none"> • The Council is committed to the ongoing regeneration of the Town Centre and considers that new office development in the Town Centre will form an important part of its regeneration plans.
<ul style="list-style-type: none"> • Support for the Council's ambitious economic plans, however; housing growth is not aligned with this. It is unclear from the employment land requirement how many jobs this would provide, and thus how many homes would be required to support that jobs growth. The LHNA 2021 has not assessed housing need based on historic take up rates and instead uses unreliable labour demand forecast. 	<ul style="list-style-type: none"> • The previous PSVLP 2019 housing target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of jobs growth to be realistic and is confident that a housing target of 816 – in line with the Government's housing methodology - will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period. • It is not possible to align jobs targets, based on forecasts which also inform the UPSVLP housing target, with the employment land target, which is based on a forward projection of past take up. This is because businesses will seek to grow their operations, generating needs for premises and land, for a range of reasons, many of which are unrelated to the number of people they employ. • It is also not viable to project forward past jobs growth as a method of forecasting future employment growth and, from that, housing needs. Changing working practices and an evolving economy mean that employment trends of the future will differ from those of the past. • The Council's position is re-enforced through the EDNA Addendum (2022) prepared in response to key issues raised from the Updated PSVLP consultation. • The Council is therefore confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's

Policy DEV4 - Economic Growth and Development (including EDNA)	
Summary of Issues Raised	Response
	methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the target in the previous PSVLP 2019. The Council is also confident that it has correctly established its objectively assessed need for employment land and that overall the Plan provides a balanced strategy for meeting Warrington's future housing and employment land needs.
<ul style="list-style-type: none"> • Welcome the designation of the entirety of Junction Nine Retail Park as being outside of any employment allocation. This is a change from the previous Plan and reflects the approved use for retailing. 	<ul style="list-style-type: none"> • Comments duly noted.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England: Historic England supports the proposed employment allocations, as they are accompanied by an appropriate assessment of the historic environment. The Plan can demonstrate that the sites can be developed without harm to the historic environment and that where harm is identified, appropriate mitigation measures are proposed. This accords with the requirements of the NPPF. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Environment Agency: Fiddlers Ferry site is proposed for inclusion. This site is a designated Local Wildlife Site (Upper Mersey Estuary Local Wildlife Site). Any development will require an assessment on the impact of the designated features. Mitigation plus Biodiversity Net Gain will be required. 	<ul style="list-style-type: none"> • Comments duly noted and the policy as written is considered to address the points raised.
<ul style="list-style-type: none"> • St Helens Council: The identification of site 1EA (in St Helens Local Plan) to assist in meeting Warrington's needs is supported and aligns with the St Helens Borough Local Plan Submission Draft. However, Table 6 state 31.80 ha for the site area, but it is 31.22ha in the St Helens Local Plan. Whilst agreement has been reached, as set out above, that the 31.22ha of site 1EA will contribute to meeting the identified employment needs of Warrington Borough, there has been no agreement reached with respect to the additional area of the site now permitted by (St Helens 	<ul style="list-style-type: none"> • Comments duly noted and it is considered that the minor discrepancy can be dealt with as an editorial change. • The Council recognises that to date no agreement has been reached on which Borough's need the additional land at Omega West will contribute to. The Council will continue to liaise with St Helens over the apportionment of the additional employment land at Omega west through the 'Duty to Cooperate'.

Policy DEV4 - Economic Growth and Development (including EDNA)	
Summary of Issues Raised	Response
Council reference P/2020/0061/HYBR and Planning Inspectorate Reference APP/H4315/V/20/3265899) for a larger 75 ha site.	
<ul style="list-style-type: none"> • National Highways: The development of the new employment areas at the South East Warrington Employment Area (SEWEA) and Fiddler's Ferry (FF) sites will be of interest to National Highways due to expected impacts on the M56 / M6 interchange and M62 corridor respectively. 	<ul style="list-style-type: none"> • Comments duly noted and the Council will continue to engage actively and constructively with National Highways.
Other	
<ul style="list-style-type: none"> • CPRE: Economic development quantum identified in the Economic Development Needs Assessment (EDNA 2021), is considered overly ambitious when considering the reality of the economy. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations.
<ul style="list-style-type: none"> • Chartered Institute of Logistics and Transport: The Plan should address future needs for decarbonised freight transport and logistics by siting major warehousing and distribution developments at rail-connected sites, or those which can be rail-connected at reasonable cost. • The proposed distribution complex close to the M6/M56 junction is completely unsustainable, since it cannot be rail-connected and would be reliant on road transport for all movements. • Port Warrington is an ideal site for a Strategic Rail Freight Interchange (SRFI) and should be reinstated to the Local Plan. • The brownfield Fiddlers Ferry power station site offers an alternative which is operationally less efficient, since it involves at least one train reversal at Arpley (two for trains arriving from the North or East), but has good on-site rail facilities and ample flat land for the construction of warehouses and an intermodal terminal. 	<ul style="list-style-type: none"> • From the available pool of sites submitted to the Council, the Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt. • The UPSVLP closely reflects the Council's Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan's Spatial Strategy and that the Main Development Areas. • There are a number of significant issues which would need to be mitigated before Port Warrington could be considered 'Suitable' for development and therefore reinstated in the Local Plan. The Council is committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. By this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction

Policy DEV4 - Economic Growth and Development (including EDNA)	
Summary of Issues Raised	Response
	improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • Stretton NDP: an over optimistic vision for large scale logistic and commercial development would clearly appear to be primarily driven by the financial advantage afforded to high profile property development companies which is to the detriment of the community. For these reasons alone justification to take green belt for this requirement is not acceptable as it does not meet the conditions of 'exceptional circumstance'. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations. • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites, including the South East Warrington Employment Area. It is considered that this allocation will make a significant and sustainable contribution towards meeting Warrington's current and long term employment development needs.
<ul style="list-style-type: none"> • National Farmers Union: it is pleasing that policy states that "The sustainable growth, expansion and diversification of local and rural businesses will be supported, subject to meeting other relevant Local Plan and national policies." 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust: Support clause 6 of policy to protect existing employment areas for employment uses. However, concerns about the level of employment growth proposed based on past assumptions and past trends continuing over the Plan period. 	<ul style="list-style-type: none"> • Comment duly noted. • The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations.

Policy DEV5 - Retail and Leisure Needs	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • No plans for regeneration of the town centre. 	<ul style="list-style-type: none"> • Policy DEV5 sets out the Council’s approach to meeting retail and leisure needs across the borough as a whole. Policy TC1 ‘Town Centre and Surrounding Area’ provides more detailed guidance on the regeneration of the Town Centre. This policy complements the strategies and guidance that the Council has developed to ensure that land and property in the town centre is developed to meet the economic, social and environmental needs of existing and future residents of the borough as well as businesses and visitors to the town centre.
<ul style="list-style-type: none"> • Concern that limited and essential shopping and leisure facilities in Warrington’s villages are being replaced with new housing developments. 	<ul style="list-style-type: none"> • The policy seeks to ensure that local shops, facilities and services are protected. This is by ensuring that when proposals come forward impacting on facilities consideration is given to the loss of those facilities where they are viable or there is an adverse impact on the availability of services to a local community.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • Though titled retail and leisure policy DEV5 makes reference to service provision through a hierarchy of centres including neighbourhood hubs. Provision of services are highlighted for neighbourhood hubs in Woolston Orford Park and Great Sankey. There is no provision highlighted for south Warrington 	<ul style="list-style-type: none"> • Policy MD2 South East Warrington Urban Extension in point 3 identifies the provision of new leisure, shops and other community facilities that will support the allocation located in south Warrington. This could take the form a neighbourhood hub and would service the wider south Warrington area.
Landowner/Developer	
<ul style="list-style-type: none"> • The owner of the Fiddlers Ferry site welcomes the opportunity for the Fiddlers Ferry masterplan to positively contribute towards sustainable neighbourhood facilities within the masterplan and considers the policy is in line with NPPF aim to secure the viability of town centres. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Support for the allocation of Culcheth Village as a neighbourhood centre and Glazebrook Village as a local centre, in the ‘Hierarchy of Centres’ in Policy DEV5 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • The approach laid out at Policy DEV5 is inconsistent with the advice provided by the NPPF and it would be better if the policy simply 	<ul style="list-style-type: none"> • The Policy is consistent with the NPPF which states that planning policies should support the role that town centres play at the heart of local

Policy DEV5 - Retail and Leisure Needs	
Summary of Issues Raised	Response
<p>replicated the advice of the NPPF or cross-referred to it. This includes detailed reference to sequential testing and local thresholds and the amount of comparison space required to the end of the plan period and calculations of that space in the Updated Retail Study 2021.</p>	<p>communities, by taking a positive approach to their growth, management and adaptation. In particular, paragraph 90(b) of the NPPF states that when considering applications for retail development there is a requirement for an impact assessment to look at vitality and viability including local consumer choice and trade.</p>
Statutory Consultees	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • The CPRE commented changes with technology and online shopping; Brexit, Covid and working from home are likely to be permanent so a cautionary approach should be taken 	<ul style="list-style-type: none"> • Comment noted
<ul style="list-style-type: none"> • Theatres Trust: consider the use of 'viable' to be problematic because without further clarification and requirement it can be used narrowly in terms of financial considerations on a full commercial basis rather than looking at alternative models such as voluntary, community and not-for-profit as may be the case for these types of uses. We also consider this policy to undermine and conflict with Policy INF4. 	<ul style="list-style-type: none"> • The Policy reflects the importance placed by National policy and the Council on the retention of community facilities including cultural facilities and the Policy is considered to provide appropriate protection to these facilities.

Objective W2 - To ensure that Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	
Landowner/Developer	
<ul style="list-style-type: none"> • W2 fails to secure the long term permanence of the Green Belt boundaries as not enough employment land has been identified in the plan. 	<ul style="list-style-type: none"> • The proposed allocations at Fiddlers Ferry and the South East Warrington Employment Area provide a total of 237.92 ha, which is marginally below the required need by around 8 ha. The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in existing employment locations. The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. • The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • Do not agree that the revised Green Belt releases sufficient land to safeguard boundaries in the future as several of the allocated sites will not be deliverable in the Plan period and the housing target is insufficient to meet housing requirements 	<ul style="list-style-type: none"> • The Council is confident that in respect of future housing needs, the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period in accordance with paragraph 136 of the NPPF. Given the Council is promoting major urban extensions as part of its spatial strategy, the Council has given consideration to an overall timescale of 30 years in accordance with paragraph 22 of the NPPF which

Objective W2 - To ensure that Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.	
Summary of Issues Raised	Response
	requires Council's to provide a longer term vision when promoting such forms of development.
Statutory Consultees	
<ul style="list-style-type: none"> • None received 	
Other	
<ul style="list-style-type: none"> • The CPRE agrees that the Green Belt should be protected but disagrees with any release of Green Belt. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension; South East Warrington Employment Area; land to the east and south of Fiddlers Ferry Power Station; Thelwall Heys and proposed allocation sites in the Outlying Settlements.
<ul style="list-style-type: none"> • The CPRE advocates more brownfield development and higher densities in inner areas. 	<ul style="list-style-type: none"> • The majority of new development will be within the existing urban area and brownfield sites will contribute significantly to delivering higher density development. • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its brownfield register, both of which are updated on an annual basis. The Council has also undertaken additional masterplanning work in the town centre and surrounding area to identify additional brownfield

Objective W2 - To ensure that Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.	
Summary of Issues Raised	Response
	capacity. As such the Council is confident the Plan will maximise the amount of development that is possible on brownfield land.

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Exceptional Circumstances have not been demonstrated to release Green Belt land for development, anywhere in the Borough, it is not justified. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension; South East Warrington Employment Area; land to the east and south of Fiddlers Ferry Power Station; Thelwall Heys and proposed allocation sites in the Outlying Settlements. • Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> • The absence of a plan for Warrington General Hospital is a serious omission, given its importance for the region's healthcare and its potential impact if relocated in the Green Belt. 	<ul style="list-style-type: none"> • Policy INF4 confirms that the Council and NHS Hospital Trust have identified a requirement for a new hospital for Warrington, either through the redevelopment of the existing hospital site or on a new site. If a new site is the Trust's preference then the Council will seek to allocate a suitable site through a future review of the Plan. The Trust are fully supportive of this policy approach.

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The use of Brownfield sites should be prioritised first for development before any Green Belt is released for development, and there is no evidence of this. 	<ul style="list-style-type: none"> • The Council has carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its brownfield register, both of which are updated on an annual basis. The Council has also undertaken additional master planning work in the Town Centre and surrounding area to identify additional brownfield capacity. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • Following consultation on the updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The potential of other Brownfield sites, for example the Unilever site have been considered through the town centre master planning process. They are considered to provide potential additional development capacity, although there is insufficient certainty at present for these sites to be included within the Council's identified residential or employment land supply. These, together with other potential brownfield sites, are part of the reason why the Council does not consider it needs to remove land from the Green Belt for 'safeguarding' for development beyond the Plan period. • A number of brownfield sites in the Plan's housing supply are not able to come forward until later in the Plan Period, due to issues including land assembly, land remediation and infrastructure constraints. As such, the Council is not able to sequence its land supply to only allow Green Belt development once all brownfield sites have been built out.

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
<ul style="list-style-type: none"> Given the Climate Change emergency, Green Belt needs to be preserved, not released for development, and be allowed to act as a carbon sink. 	<ul style="list-style-type: none"> The Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on Climate Change through the Sustainability Appraisal process. The Council strengthened reference to Climate change in the vision and objectives of the Updated Proposed Submission Version Local Plan to reflect the Council having declared a Climate Emergency. A number of the Local Plan policies include specific provision to reduce and mitigate the impacts of development on climate change and to ensure new development is resilient to the potential effects of climate change.
<ul style="list-style-type: none"> Green Belt release will be detrimental to wildlife, our health and well-being and the Agricultural industry. 	<ul style="list-style-type: none"> The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process.
<ul style="list-style-type: none"> Release of Green Belt is justified by the need for affordable homes. However most land to be released is in South Warrington where house prices are highest, town centre is most suitable for affordable homes. Most land for release is furthest from Town Centre, thus increasing vehicle usage. 	<ul style="list-style-type: none"> New development in south Warrington will be required to provide 30% affordable housing. Policy DEV2 requires that two thirds of this should be affordable for rent, which will be for people on the Council's housing waiting list. A third should be for low cost home ownership, of which the majority will be 'First Homes' specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers. With regard to rents the Policy includes a safeguard that rents should not exceed the Local Housing Allowance rates.

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential economic benefits of focussing development, including that proposed in South Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington.
<ul style="list-style-type: none"> NPPF and Government policy on Green Belt not being followed. 	<ul style="list-style-type: none"> In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release.
<ul style="list-style-type: none"> Green Belt release is contrary to the objective of assisting in Urban Regeneration. 	<ul style="list-style-type: none"> In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. Part of the Exceptional Circumstances for Green Belt release is the Plan's spatial strategy, with Green Belt release contributing to the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites and promote urban regeneration.
<ul style="list-style-type: none"> Impact of loss of Green Belt on the environment and ecology not taken into account. 	<ul style="list-style-type: none"> In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council has ensured that the allocation policies include specific provision to protect and enhance ecology and biodiversity and to ensure nature conservation. Where there are impacts on important ecological assets, the Plan requires extensive mitigation to offset the loss of habitat and the allocation policy requires an overall net increase in biodiversity in accordance with the NPPF and the

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	Environment Act 2021. In preparing the Plan, the Council has worked closely with statutory consultees including Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard.
<ul style="list-style-type: none"> • Green Belt boundaries were only confirmed 7 years ago in the current Local Plan, to supposedly last for 20 years, so why change them now? 	<ul style="list-style-type: none"> • Following the High Court ruling in 2015 which quashed the housing target in the Council's adopted Local Plan Core Strategy (2014), the Council sought to update its housing policies. However, it became clear that the Borough's development needs going forward could no longer be met within the existing urban area, without exploring the need to release Green Belt land. The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development needs and demonstrated that Exceptional Circumstances exist in order to do so.
<ul style="list-style-type: none"> • Green Belt release will change the character of the villages and the town forever and Green Belt should be protected from development. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that the development proposed will change the character of some areas of Warrington that have been allocated for development. The Council has, however, ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities. • New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements.
<ul style="list-style-type: none"> • Building on Thelwall Heys will result in run off from the development going to existing high flood risk areas. 	<ul style="list-style-type: none"> • The Council has undertaken a Strategic Flood Risk Assessment in considering potential development allocations in the updated PSVLP. The vast majority of the site is within Flood Zone 1. • The allocation policy requires a site-wide foul and surface water strategy incorporating appropriate Sustainable Drainage Systems (SUDS) and flood

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	alleviation measures. The surface water strategy will be required to improve on greenfield run-off rates.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> The revised National Planning Policy Framework strengthened the protection of the Green Belt. Exceptional circumstances have not been demonstrated to release Green Belt land for development. 	<ul style="list-style-type: none"> In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension; South East Warrington Employment Area; land to the east and south of Fiddlers Ferry Power Station; Thelwall Heys and proposed allocation sites in the Outlying Settlements. Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> The loss of Green Belt in South Warrington's is disproportionate and there are areas in north and the north east of Warrington that could take more development. 	<ul style="list-style-type: none"> The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meetings Warrington's development needs as part of the Plan's overall Spatial Strategy whilst ensuring the long term integrity of Warrington's Green Belt.

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the updated PSVLP (2021) compared to the previous PSVLP 2019 and that the majority of the new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal.
<ul style="list-style-type: none"> • The draft plan will destroy 1,000 acres of Green Belt including Thelwall Heyes. Thelwall Heys performs an important Green Belt function in preventing the Thelwall from sprawling into neighbouring countryside. 	<ul style="list-style-type: none"> • 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 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 Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt Release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated PSVLP 2021, including Thelwall Heys. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries. • The Council is satisfied that the allocation sites, including Thelwall Heys, can be removed from the Green Belt without significantly impacting on the function of Warrington's Green Belt at a strategic and local level.
<ul style="list-style-type: none"> • Green Belt boundaries were only set 7 years ago and were supposed to last for 20 years. 	<ul style="list-style-type: none"> • Following the High Court ruling in 2015 which quashed the housing target in the Council's adopted Local Plan Core Strategy (2014), the Council sought to update its housing policies. However, it became clear that the Borough's development needs going forward could no longer be met within the existing urban area, without exploring the need to release Green Belt land. The Council is only proposing to change Green Belt boundaries having exhausted all other options to meet its development

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	needs and demonstrated that Exceptional Circumstances exist in order to do so.
<ul style="list-style-type: none"> Given the Prime Minister's and Secretary of State announcement that they want to protect Green Belt from Development, the Plan should be put on hold until the Government clarifies its policy in this area next year. 	<ul style="list-style-type: none"> The preparation of the Local Plan has been undertaken in accordance with the Government's current NPPF and associated Planning Guidance. The Government has written to all Councils to confirm that they should not delay preparing Local Plans and has confirmed that all Councils need to have an up to date Local Plan in place by 2023. In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release.
<ul style="list-style-type: none"> The proposed allocations and policies fail to meet the 5 tests of Green Belt. 	<ul style="list-style-type: none"> The Council carried out a full assessment of the Borough's Green Belt to support the Local Plan. The aim of the Green Belt Assessment is to provide an objective, evidence-based and independent assessment of how Warrington's Green Belt contributes to the five purposes of Green Belt set out in national policy. The approach is clearly explained and justified in the Council's Green Belt Assessment Reports.
<ul style="list-style-type: none"> Green Belt land allocated consists of best and most versatile agricultural land, contrary to NPPF protection requirements. 	<ul style="list-style-type: none"> The quality of agricultural land was taken into account in the Council's spatial option and site assessment processes and in the Plan's Sustainability Appraisal. The Council has sought to minimise the loss of the best and most versatile agricultural land. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan's objectives and SA/SEA site assessment criteria to establish that the sites were 'suitable'. The agricultural quality of the land was just one the criteria that were used to assess the sites. Since the majority of the Borough is covered by similar quality agricultural land this has little impact on the overall assessment of sites. The amount of land to be removed from the Green Belt (and hence the amount of BMVAL to be lost) has significantly reduced in the Updated PSVLP (2021) compared to

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	the previous PSVLP (2019). It is now only proposed to remove 5% of land from the Green Belt compared to 11% previously. The vast amount of agricultural land in the Borough will be retained.
<ul style="list-style-type: none"> • The Green Belt assessment concludes that the sites allocated in Lymm make a limited contribution to the Green Belt's function. This is contended and is challenged. 	<ul style="list-style-type: none"> • 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 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 Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt Release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated 'Proposed Submission Version Local Plan'. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries. • The Council are satisfied that these reports provide a robust assessment of the performance of Warrington's Green Belt and the implications of releasing the proposed allocation sites.
<ul style="list-style-type: none"> • The protection of Green Belt is mentioned in the Fiddlers Ferry allocation policy as important in separating Halton and Warrington. However the Council encouraged the Home Bargains development at Omega in St Helens which is hypocritical, along with the protection of Burtonwood. 	<ul style="list-style-type: none"> • As part of the Duty to Cooperate process, the Council has engaged ongoing and constructively with all its neighbouring authorities about meeting development needs. Through this process it was concluded that given the location of the Omega west extension in St Helens, that circa 32 hectares of employment land in the Borough of St Helens, as proposed to be allocated in the draft St Helens Local Plan would count towards meeting Warrington's employment land needs. In reaching this agreement both Warrington and St Helens were content that the proposed allocation would not compromise the Green Belt separating Warrington and St Helens.

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<ul style="list-style-type: none"> Logistic providers are attracted to motorway junctions and the need is easy to make. However, policy fails to address whether other locations in and outside the Borough are available and more suitable thereby avoiding unnecessary and unjustified irrevocable destruction of a vast area of Green Belt. 	<ul style="list-style-type: none"> Warrington needs to plan for its own economic development land needs, whilst considering and understanding how the sub-regional economy operates. The Council's EDNA (2021) provides analysis of Warrington's wider economic geography in establishing Warrington employment land needs. The Council has also worked closely with neighbouring authorities who form part of the wider economic sub-region as part of the Local Plan Duty to Co-operate process to ensure consistency in the preparation of Local Plan and that strategic issues are appropriately addressed. As part of the Duty to cooperate process, it was concluded that given the location of the Omega west extension (also Green Belt land) in St Helens that circa 32 hectares of employment land in the Borough of St Helens would count towards meeting Warrington's employment land needs. As can be seen, not just Warrington, but all neighbouring local authorities are having to explore the need to release Green Belt to meet development needs.
<ul style="list-style-type: none"> Plan draws heavily on the ARUP Green Belt Assessment and there are concerns with the ARUP Green Belt assessment as it references 'professional judgement.' This approach contains flaws and fails to look at the Green Belt in Warrington as a single entity with regard to its functions. The assessment of the function of Green Belt in different parts of the borough, including in south Warrington, is also flawed. 	<ul style="list-style-type: none"> 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 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 Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt Release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated 'Proposed Submission Version Local Plan'. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries.

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	<ul style="list-style-type: none"> The Council are satisfied that these reports provide a robust assessment of the performance of Warrington's Green Belt and the implications of releasing the proposed allocation sites.
<ul style="list-style-type: none"> Do not believe that the decline in office space due to working from home has been factored in to Green Belt release. 	<ul style="list-style-type: none"> The Updated PSVLP is based on a detailed evidence base assessing Warrington's future employment land needs (EDNA 2021). Having considered the most up-to-date economic context, including the impacts of COVID, the Council has sought to minimise the amount of Green Belt land being released and has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington.
<ul style="list-style-type: none"> The refusal of development at Barley Castle should be taken in to account in the Green Belt Assessment. 	<ul style="list-style-type: none"> Part of the allocation (the Stobart's site) has been the subject of a planning application appeal, with the appeal subsequently being rejected by the Government. However, the test for acceptable development in the Green Belt by way of a planning application is demonstrating that Very Special Circumstances exist to warrant the granting of planning permission. The test for removal of land from the Green Belt through the Local Plan process to meet identified development needs, is demonstrating that Exceptional Circumstances exist. The fact that a parcel of land within the proposed SEWEA has been refused planning permission, does not preclude the Council from demonstrating that 'Exceptional Circumstances' exist for the release of the wider employment allocation.
<ul style="list-style-type: none"> The requirement relating to flexibility of supply is biased towards development in the Green Belt. 	<ul style="list-style-type: none"> 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. 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 flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure. For employment land the Council has included a

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	buffer of 3 years in line with the recommendations set out in the ENDA 2021.
<ul style="list-style-type: none"> The plan fails to show NPPF requirement to enhance environmental quality and access to remainder of the Green Belt. 	<ul style="list-style-type: none"> Local Plan allocation policies for land being removed from the Green Belt include a requirement to provide a scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt.
Landowner/Developer	
<ul style="list-style-type: none"> Developers consider the Green Belt release and the housing allocation at Fiddlers Ferry Power Station has not been justified – it has not been demonstrated that it would not adversely affect the integrity of the Mersey Estuary SPA and Ramsar. 	<ul style="list-style-type: none"> The Council has fully justified Green Belt release at Fiddlers Ferry through its Options Assessment process and considers that the regeneration of the former power station, including the restoration of the lagoons on the southern section of the site, provide the Exceptional Circumstances. It is considered that the HRA has adequately assessed the impact of the proposed allocation on the Mersey Estuary SPA. The HRA of the Local Plan has assessed the policy and allocation in broad terms (i.e. the principle of development on this site for 101ha of employment land, a minimum of 1,760 new homes and community facilities), rather than the details of any particular masterplan, vision, or developer aspirations. The assessment carried out has to be proportionate to the stage of the plan or proposal at the time. Adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure. The site allocation policy (MD3) requires a project specific HRA to be undertaken if habitats within the allocation site or on adjacent land are found to support significant populations of qualifying species of wintering birds.
<ul style="list-style-type: none"> Landowner promoting Fiddlers Ferry consider that exceptional Circumstances have been demonstrated to release land from the Green Belt in this location. 	<ul style="list-style-type: none"> Support for allocation of the site noted.

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<ul style="list-style-type: none"> • Developers consider that there are exceptional circumstances for further Green Belt release to ensure that the Borough's development needs for employment and housing are met. Some developers argue that this should include the addition of smaller deliverable site, rather than relying on large allocations. 	<ul style="list-style-type: none"> • The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt. • 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 (para 72). This is reflected in the results of the spatial options assessment and SA/SEA which has informed the Plan's Spatial Strategy. • Nevertheless, the Spatial Strategy already ensures additional small and medium sizes sites will come forward from the proposed Green Belt release in the outlying settlements and at Thelwall Heys early in the Plan Period in addition to the continued provision from existing sources in the wider urban area • With regard to employment land, the proposed allocations at Fiddlers Ferry and the South East Warrington Employment Area provide a total of 237.92 ha, which is marginally below the required need by around 8 ha. The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in existing employment locations. The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. • The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land.

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<ul style="list-style-type: none"> • A developer considers that there are deficiencies in the Council's urban supply figures and the evidence base shows this. Also do not take account of the Council's own evidence regarding the viability of residential development in different parts of the urban area which demonstrates that a number of areas within the Borough, most notably the Town Centre, are not viable for residential development even with nil affordable housing contributions. • Therefore, the Plan should identify additional land in the Green Belt which is capable of providing up to 7,696 dwellings over the plan period to remedy the identified shortfall in the urban areas. 	<ul style="list-style-type: none"> • The NPPF requires the Council to make as much use as possible of suitable brownfield sites and underutilised land (para 141). To ensure it meets this requirement, in preparing the Updated PSVLP (2021), the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional masterplanning work in the town centre and surrounding area to identify additional brownfield capacity. This masterplanning work was incorporated into the SHLAA, enabling each site to be assessed in terms of availability and deliverability. • The Council acknowledges that it had not clearly identified all of the sites which formed its urban capacity figure. Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. This has resulted in a marginal decrease in urban capacity which is not material to the Plan's overall land supply position. • The Council has also produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington. The Council is confident these sites will come forward and will compliment suburban and Green Belt release sites which together will provide a wide range of housing types to meet Warrington's needs.
<ul style="list-style-type: none"> • A developer considers the Council uses a number of unsubstantiated points to arrive at a conclusion that housing requirements will contract looking ahead to beyond the plan period. In considering supply beyond the Plan period, there is effectively no provision in the PSVLP2021 for 	<ul style="list-style-type: none"> • 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. The Council also notes that the

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<p>ensuring the Outlying Settlements post plan period needs are catered for. The effective result of this is that it is inevitable that the Green Belt boundaries around the Outlying Settlements will not endure beyond the plan period based on the strategy being pursued.</p> <ul style="list-style-type: none"> • Therefore the Plan should release further Green Belt land to be safeguarded in the Outline Settlements. 	<p>rate of increase in households is projected to decrease over the last 10 year period of the Plan. Given the rate of job growth is also forecast to decrease over time, the Council considers there will not be a requirement for any uplift in housing numbers to provide a balance with future jobs growth.</p> <ul style="list-style-type: none"> • The Council considers that there will be sufficient land supply to meet the level of housing need for at least 12 years following the end of the Plan period. The Council is therefore confident that there is no need for any safeguarding of land in respect of future housing needs, including in the outlying settlements, and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period.
<ul style="list-style-type: none"> • The Council has previously concluded, through the evidence base to the 2019 PSLP, that the SWUE represents a sustainable and suitable site to meet the then higher development needs. Through a consortium of developers with an interest in this site, a deliverable masterplan is presented within an up to date development prospectus. Therefore allocation MD3 (south west urban extension) should be reinstated as a site to be removed from the Green Belt to meet housing need, as the site is suitable, achievable, deliverable and developable early on in the Plan period. 	<ul style="list-style-type: none"> • Spatial options which included the South West Urban Extension were given extensive consideration through the SA/SEA and Local Plan Options assessment process, taking into account representations made to the previous Regulation 19 consultation. Options including this urban extension did not perform as well as the chosen spatial strategy. In particular, the South West Urban Extension would not provide the brownfield regeneration benefits of Fiddlers Ferry or such wide ranging infrastructure benefits of the South East Warrington Urban Extension. The Council also has concerns about the potential impact of the South West Urban Extension on the Western Link.
<ul style="list-style-type: none"> • Developer consider that not only should safeguarded land be identified, but policy should include a 'trigger' which allows safeguarded land to come forward when land supply issues are experienced. 	<ul style="list-style-type: none"> • The Council considers that there will be sufficient land supply to meet the level of housing need for at least 12 years following the end of the Plan period. The Council is therefore confident that there is no need for any safeguarding of land in respect of future housing needs and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period. If housing land supply issues become apparent through the Council's monitoring process, then the Council will give consideration to a review of the Plan in accordance with Policy M1.

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	<ul style="list-style-type: none"> • Although the required employment land need is marginally below the required need by around 8 ha, the Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period. • The Council has considered a number of other options for employment land allocations, but at present these have a range of significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • Developer promoting Port Warrington and the Commercial Business Park, considers that given their unique location and offer, alongside the Council not meeting its full employment land requirement in the Plan period, and no provision is made beyond the Plan period for meeting need, that exceptional circumstances exist to warrant the reinstatement of Port Warrington and the Commercial Business Park in to the Local Plan. 	<ul style="list-style-type: none"> • The Council has given detailed consideration to the proposed expansion of Port Warrington (including the Business Hub) and they performed strongly in terms of its benefits as an employment location in the EDNA (2021). • Port Warrington (including the Business Hub) were proposed to be allocated in the previous PSVLP 2019, but extending the Port will result in loss of part of Moore Nature Reserve and there are significant concerns regarding the potential impact on the Western Link. In particular, to mitigate the impact on the Western Link it is likely that significant additional capacity will need to be provided at the junctions of the Western Link and the A57 and the A56. The scale of improvements required to these junctions is likely to raise significant engineering, deliverability and viability issues.

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	<ul style="list-style-type: none"> The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. By this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> The developer promoting land South of Chester Road considers it as a significant site in its own right should the Council require it as an alternative option to meeting their housing land supply shortfall, particularly their 5YHLS. It is a sustainable and deliverable residential development site that will directly contribute to meeting core objectives of WBC's UPCVLP, namely homes within the first 5 years of the Plan period, much needed affordable homes and specialist elderly care accommodation, as well as providing land that is critical to the delivery of the WWL. The site should therefore be reinstated in the Local Plan. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Developer promoting land at Reddish Lane/Rushgreen Road, Lymm, considers that it should be removed from the Green Belt and allocated to meet housing need. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Landowner promoting land at Woodlands Alpaca Farm is supportive of the land being removed from the Green Belt and being re classified as part of the urban area. 	<ul style="list-style-type: none"> Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> The landowner of Bents Garden Centre considers that exceptional circumstances exist to remove the site from the Green Belt based on their submitted evidence, as the inclusion of the land in the Green Belt is inconsistent with the NPPF. 	<ul style="list-style-type: none"> It is considered that since the adoption of the Local Plan Core Strategy (2014), there have been no material change in circumstances to warrant a change of Green Belt boundaries in this location.
<ul style="list-style-type: none"> A landowner contends that the settlement boundary of Broome Edge should be revised and adjusted to reflect the recent new development on 	<ul style="list-style-type: none"> It is considered that since the adoption of the Local Plan Core Strategy (2014), there have been no material change in circumstances to warrant

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<p>the ground in the settlement. The redevelopment of the former Willowpool Garden Centre site (for 10 residential park homes under Appeal Ref. APP/M0655/A/14/2227516) has extended the village to the north, such that the village boundary should now include this land, and wrap around the existing built area/residential curtilages.</p>	<p>a complete review of Washed Over and Green Belt settlements. The exception to this, as proposed in the revised PSVLP 2021, is an amendment to Stretton's Green Belt boundary, due to the SEWUE allocation.</p> <ul style="list-style-type: none"> • The Council considers that the Plan as written is 'sound.' However, the Inspector might be minded to suggest modifications to the current policy as written to reflect the comments made, if they consider it is necessary to make the Plan 'sound'.
<ul style="list-style-type: none"> • A landowner contends that based on the evidence submitted, and changes to Green Boundaries in the UPSVLP, land at 420 Stockport Road should be removed from the Green Belt, as it will otherwise leave an isolated parcel of Land in the Green Belt. 	<ul style="list-style-type: none"> • The Council considers that the Plan as written is 'sound' and the revised Green Belt boundaries are robust.
<ul style="list-style-type: none"> • A developer considers Part (8) in respect of Washed Over Settlements duplicates National Policy and other policies of the Local Plan and it is unclear how this part of the Policy relates to Part (12) in respect of other forms of development. The Council seeks to arbitrarily restrict national Green Belt planning policy such that paragraph 149(e) only applies to certain locations of the Borough. Again, there is no explanation or justification for the Council's approach from the evidence base available for the draft local plan. The reality is that the settlement boundary has been drawn so tightly around Broom hedge that no limited infill development could take place. 	<ul style="list-style-type: none"> • It is considered that since the adoption of the Local Plan Core Strategy (2014), there have been no material change in circumstances to warrant a complete review of Washed Over and Green Belt settlements. The exception to this, as proposed in the revised PSVLP 2021, is an amendment to Stretton's Green Belt boundary, due to the SEWUE allocation.
<ul style="list-style-type: none"> • Developers consider the exceptional circumstances for Green Belt release at various villages has not been fully justified, and that the part of the policy which deals with washed over Green Belt settlements is unsound and unjustified and needs to be updated. There is no evidence base to support the Council's decision on Washed over settlements and why some have been included and others discounted. 	<ul style="list-style-type: none"> • It is considered that since the adoption of the Local Plan Core Strategy (2014), there have been no material change in circumstances to warrant a complete review of Washed Over and Green Belt settlements. The exception to this, as proposed in the revised PSVLP 2021, is an amendment to Stretton's Green Belt boundary, due to the SEWUE allocation.

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<ul style="list-style-type: none"> • Developers consider additional land should be allocated, or safeguarded, to meet the needs within and beyond the Plan period, and the Council should reconsider its strategy regarding safeguarded land. 	<ul style="list-style-type: none"> • The Council considers that there will be sufficient land supply to meet the level of housing need for at least 12 years following the end of the Plan period. The Council is therefore confident that there is no need for any safeguarding of land in respect of future housing needs and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period. • Although the required employment land need is marginally below the required need by around 8 ha, the Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period. Should the western extension of Omega be approved following the S78 inquiry, then this could make a further contribution to meeting Warrington's employment land needs. • The Council has considered a number of other options for employment land allocations, but at present these have a range of significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> • Support from developers of the need to review Green Belt boundaries and the conclusions that exceptional circumstances have been demonstrated to release Green Belt land for development. 	<ul style="list-style-type: none"> • Agreed. The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt land proposed for release.

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<ul style="list-style-type: none"> • A Developer promoting a site considers that site specific 'exceptional circumstances' for Green Belt release should be revised. This should reflect the circumstances that support the release of land at Junction 11 of the M62 from the Green Belt in order to meet the established gaps in MSA provision. 	<ul style="list-style-type: none"> • There is no specific requirement for the Local Plan to make provision for a Motorway Service Area.
<ul style="list-style-type: none"> • Developers consider more details are required for the compensatory Green Belt measures. Developers consider that it is essential that compensatory improvements are proportionate and reasonably and fairly related to the scale and location of the site, and are not set at a scale that could undermine the delivery of the Plan. 	<ul style="list-style-type: none"> • The requirements and contributions from each individual allocation will be determined on a case by case basis, to and will ensure that the scale of contributions and or works needed do not undermine the delivery of the Plan.
<ul style="list-style-type: none"> • Developer considers that further Green Belt release is required in South East Warrington to facilitate the Howshoots link road, regardless of whether or not the Garden Suburb allocation is reinstated. 	<ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension accurately refers to the need to ensure that vehicles from the urban extension are able to efficiently access the A50. It does not specify the need for a direct connection. The Council is therefore confident the allocation is deliverable without the need for further Green Belt release.
<ul style="list-style-type: none"> • A developer promoting land in the SEWEA supports the release of land to facilitate the SEWEA. However, suggest that there is a need for housing land to be released at Appleton Thorn and safeguarded land for long term employment development at Six 56 Phase II. The Plan states that the employment land will be reviewed before the end of the Plan period, which is currently 2038. This statement is inconsistent and does not reflect the strategy or evidence of the Plan. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate. • The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment, including Six56 Phase II. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land.
<ul style="list-style-type: none"> • Developer promoting sites supports the recognition that Green Belt release in the outlying settlements will increase housing choice and support the vitality and viability of local services without placing 	<ul style="list-style-type: none"> • Comments duly noted.

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
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unacceptable pressure on local infrastructure, whilst maintaining local character. Specifically support the removal of land from the Green Belt at Winwick (OS6).	
<ul style="list-style-type: none"> Landowner promoting a site adjacent to the allocated South East Warrington Employment Area considers that the resultant Green Belt boundary would include land which does not fulfil any Green Belt purpose and land which is not necessary to keep permanently open. This would form an island of Green Belt land and it is request that this parcel of land is removed from the Green Belt. 	<ul style="list-style-type: none"> The Council considers that the Plan as written is 'sound' and that the revised Green Belt boundaries and robust.
<ul style="list-style-type: none"> Developer promoting land in Burtonwood considers that as there is no secure forward supply of land to 2050 set out, that land at Clay Lane, Burtonwood should be removed from the Green Belt and policy amended to reflect this. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Developer promoting employment land considers the Green Belt Site Selection report ('Implications of Green Belt Release'), which forms part of the Local Plan evidence base, is correct in its conclusion that the removal of the South East Warrington Employment Area from the Green Belt would not harm the overall function and integrity of the Warrington Green Belt. 	<ul style="list-style-type: none"> Comments duly noted.
<ul style="list-style-type: none"> Developer promoting land in Birchwood considers that land at South Station Place, Birchwood should be added to the list of sites that have demonstrated Exceptional Circumstances and be removed from the Green Belt. This would provide a new access to Birchwood Train Station and a Park and Ride facility, along with making a significant contribution to employment land needs. 	<ul style="list-style-type: none"> The Council has reviewed the information submitted by the developer but is of the opinion that at this stage, land to the south of Birchwood Station is also an unreasonable option for employment development. The developer has carried out some provisional investigation into underlying peat, but the Council's ecological consultants do not think this is sufficient to overcome what would likely to be a significant objection from Natural England. Further, whilst the council agrees there are long term benefits in terms of access to the station and potential improvements to the station including a new park and ride facility, the developer has not submitted any detailed proposals in terms and viability and deliverability. Further, the daytime frequency of rail services on the Warrington to Manchester /

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	<p>Liverpool line ,including and in particular at Birchwood Station, is planned to be reduced from December 2022 as part of Network Rail's Manchester Rail Recovery Taskforce programme. Therefore, whilst the principle of station improvements is supported by Network Rail and the Rail Delivery Group, and the council continues to lobby hard for further enhancements, the Council is concerned at this stage, that the committed service levels from December 2022 are unlikely to support the business case for the station improvements and park and ride facility proposed, and insufficient evidence has been produced by the developer to indicate otherwise. As such, the Council will consider land south of Birchwood as part of any future review of employment land in accordance with Policy DEV4 of the UPSVLP.</p> <ul style="list-style-type: none"> • The UPSVLP closely reflects the Council's Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan's Spatial Strategy and that the Main Development Areas, including the South East Warrington Employment Area. The allocation policy for the South East Warrington Employment Area in the UPSVLP includes a range of measures to promote active transport, including walking and cycling, and improvements to public transport serving the allocation and surrounding area.
<ul style="list-style-type: none"> • A developer promoting an alternative employment site considers the land proposed for removal at south Warrington employment area performs a number of green belt functions and its removal would be harmful to the overall character and openness of the Warrington green belt. It is poorly related to existing settlement boundaries and there are doubts about whether it is an appropriate parcel of land to be considered for green belt removal and whether it would be deliverable within the plan period 	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt Release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated PSVLP 2021, including the South East Warrington Employment Area. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries. • The Council is satisfied that the allocation sites, including the South East Warrington Employment Area, can be removed from the Green Belt without significantly impacting on the function of Warrington's Green Belt at a strategic and local level.

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Summary of Issues Raised	Response
<ul style="list-style-type: none"> Land at the junction of Lady Lane and Mustard Lane in Croft should be removed from the Green Belt and allocated for residential development. There appears to be no suitable justification for this land to remain within the Green Belt considering that it comprises part of Croft, which has already, in part, been removed from the Green Belt and identified as an Inset Settlement. 	<ul style="list-style-type: none"> The Council considers that the Green Belt boundaries as proposed to be amended are sound. However, the Inspector might be minded to suggest modifications to the current policy as written to reflect the comments made, if they consider it is necessary to make the Plan 'sound'.
<ul style="list-style-type: none"> Land to the west of Warrington Road in Glazebury should be removed from the Green Belt. There appears to be no suitable justification for this land to remain within the Green Belt considering that part comprises built development, on a street which is already partly within the Inset Settlement boundary and the remainder represents part of the residential curtilage of an existing property 	<ul style="list-style-type: none"> The Council considers that the Green Belt boundaries as proposed to be amended are sound. However, the Inspector might be minded to suggest modifications to the current policy as written to reflect the comments made, if they consider it is necessary to make the Plan 'sound'.
Statutory Consultees	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None.
Other	
<ul style="list-style-type: none"> Warrington Climate Emergency Commission: The NPPF Identifies that local plans should "Consider identifying suitable areas for renewable and low-carbon energy sources, and supporting infrastructure, where this would help secure their development" (Section 14, p. 45).' There is a lack of identification of sites for renewable energy in the draft plan. We believe it justifiable that some land in the Green Belt is appropriate for renewable generation projects, particularly solar farms, where the nature of such developments and the climate emergency benefits of producing clean energy can be justified in the context of the climate emergency. 	<ul style="list-style-type: none"> Comments are duly noted and welcomed. However, when located in the Green Belt (NPPF. Par 151), elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. Therefore, it is considered that the most appropriate mechanism to secure renewable energy projects within the Borough is through the development Management process and demonstrating a case for very special circumstances.
<ul style="list-style-type: none"> Rethinking South Warrington's Future: There is no justification for the scale of Green Belt release proposed. The release of Green Belt land throughout the proposed local plan area is both unjustified and unsound. It will remove valuable agricultural land from productive food production 	<ul style="list-style-type: none"> In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites,

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<p>and will cause untold harm to the environment. It clearly flies in the face of complying with climate change requirements and promoting a move to a carbon neutral future. Points supported by various detailed reports.</p>	<p>before concluding that 'Exceptional Circumstances' exist to justify Green Belt release.</p> <ul style="list-style-type: none"> • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension; South East Warrington Employment Area; land to the east and south of Fiddlers Ferry Power Station; Thelwall Heys and proposed allocation sites in the Outlying Settlements. • Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> • Stretton NDP: The proposed amount of Green Belt land to be released is contrary to the NPPF and Exceptional Circumstances have not been demonstrated. Warrington will lose approximately 10% of its Green Belt however nearly 90% of that is in South Warrington – this is unbalanced and disproportionately spread across the Borough. There should be no loss of greenbelt unless and until the economic benefits have been fully and openly appraised, and only then that they meet exceptional circumstances. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'.

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	<ul style="list-style-type: none"> • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension; South East Warrington Employment Area; land to the east and south of Fiddlers Ferry Power Station; Thelwall Heys and proposed allocation sites in the Outlying Settlements. • Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> • Lymm Neighbourhood Plan Group: No justification for Green Belt release. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension; South East Warrington Employment Area; land to the east and south of Fiddlers Ferry Power Station; Thelwall Heys and proposed allocation sites in the Outlying Settlements. • Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential

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Summary of Issues Raised	Response
	changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> • Winwick Resident Group: No Exceptional Circumstances for Green Belt release. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension; South East Warrington Employment Area; land to the east and south of Fiddlers Ferry Power Station; Thelwall Heys and proposed allocation sites in the Outlying Settlements. • Demonstrating Exceptional Circumstances to release Green Belt land for development has also resulted in some minor additional consequential changes to the existing Green Belt boundaries to ensure that the remaining Green Belt fulfils the purposes and function of Green Belt land, and the revised boundaries are durable beyond the Plan period.
<ul style="list-style-type: none"> • Trams for Warrington: The proposed Green Belt release is not justified as the housing target is too high. 	<ul style="list-style-type: none"> • The standard housing methodology defines the minimum housing need figure for a Council's area. The Council has demonstrated that the infrastructure required to support a housing target in line with the standard housing methodology is capable of being delivered and that areas of Green Belt can be released without compromising the overall

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
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	<p>function of Green Belt across the borough and the wider sub-region. It should be noted that all neighbouring boroughs have either released Green Belt in their adopted Plans or are currently preparing Plans which are proposing to do so. As such, in considering the Presumption in Favour of Sustainable Development, as set out in paragraph 11 of the NPPF, the Council does not consider there are any strong reasons for restricting the overall scale of development in Warrington and setting a housing requirement below the minimum housing need figure.</p>
<ul style="list-style-type: none"> • Cheshire Wildlife Trust: Support the need to plan positively to enhance beneficial use of Green Belt, however; changes needed to clarify that “beneficial” use must be for uses “consistent with” the Plan’s policies on green infrastructure rather than just “as part of” the Borough’s green infrastructure network. • Also support the delivery of compensatory improvements to the Green Belt, however; clarity needed on what environmental improvements will be sought (and this should include proposals for enhanced biodiversity) and in which circumstances developers will need to provide or fund the improvements referred to. • CWT believe the Council has not correctly considered the requirement to make as much use as possible of suitable brownfield sites and underutilised land (as per NPPF Policy 141). 	<ul style="list-style-type: none"> • The Council considers that the Policy as written is ‘sound’ and sufficient clarity is provided. • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release.
<ul style="list-style-type: none"> • Campaign to Protect Rural England: Object to the release of Green Belt land, more sites need to be identified on the Council’s Brownfield Register and the site selection promotes development of greenfield land at the rural fringe and open greenspace and this is contrary to the spatial distribution of development that the Warrington Draft Local Plan Vision and Strategic Objectives aim to achieve. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release.
<ul style="list-style-type: none"> • National Farmers Union: There are a considerable number of agricultural businesses within Warrington with a wide range of farming types. These not only provide food, employment and environmental output but are 	<ul style="list-style-type: none"> • The quality of agricultural land was taken into account in the Council’s spatial option and site assessment processes and in the Plan’s Sustainability Appraisal. The Council has sought to minimise the loss of

Policy GB1 - Warrington's Green Belt, (including demonstrating Exceptional Circumstances)	
Summary of Issues Raised	Response
<p>custodians of the green space which has enormous benefits in terms of health.</p>	<p>the best and most versatile agricultural land. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan's objectives and SA/SEA site assessment criteria to establish that the sites were 'suitable'. The agricultural quality of the land was just one the criteria that were used to assess the sites. Since the majority of the Borough is covered by similar quality agricultural land this has little impact on the overall assessment of sites. The amount of land to be removed from the Green Belt (and hence the amount of BMVAL to be lost) has significantly reduced in the Updated PSVLP (2021) compared to the previous PSVLP (2019). It is now only proposed to remove 5% of land from the Green Belt compared to 11% previously. The vast amount of agricultural land in the Borough will be retained.</p>

Objective W3 - To strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub, whilst transforming the quality of the public realm and making the Town Centre a place where people want to live.	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The release of Green Belt for employment and residential development in South Warrington will reinforce the disconnect between residents and use of the town. Residents will continue to use the motorway network to access town centre retail and leisure in more attractive locations. 	<ul style="list-style-type: none"> • The updated PSVLP closely reflects the Council's Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan's Spatial Strategy and that the Main Development Areas, including those in south Warrington and other areas in the Plan are able to be well served by public transport. • The allocation policies in south Warrington include a range of measures to improve public transport serving the allocation and surrounding area together. • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. This is identified in the Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.
Landowner/Developer	
<ul style="list-style-type: none"> • Support for strengthening of the town centre's role as a regional employment, retail, leisure, cultural and transport hub plus a place where people want to live. 	<ul style="list-style-type: none"> • Support noted.
Statutory Consultees	
<ul style="list-style-type: none"> • The Warrington and Halton NHS Trust supports the strengthening of transport linkages to the town centre and welcomes the recognition of the need for a new hospital. 	<ul style="list-style-type: none"> • Support noted for transport linkages.
Other	
<ul style="list-style-type: none"> • The CPRE comments that Warrington should not undermine the role of the combined authority areas of Liverpool and Greater Manchester. 	<ul style="list-style-type: none"> • The strengthening of Warrington will not undermine neighbouring authorities. The objective reflects the need as per the NPPF to secure sustainable development of the town centre that meets economic, social

Objective W3 - To strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub, whilst transforming the quality of the public realm and making the Town Centre a place where people want to live.	
Summary of Issues Raised	Response
	and environmental objectives. The objective will also support the regeneration of the town centre with new development supporting its role for leisure and cultural activities, commercial activity and as a high quality residential environment.

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • More Focus should be put upon the Town Centre's regeneration 	<ul style="list-style-type: none"> • The regeneration of the Town Centre is key element of the Plan's spatial strategy. TC1 has been prepared to support the extensive plans and ambitions that the Council has for the regeneration of the town centre. The Council has prepared and adopted a Town Centre Masterplan which identifies development opportunities in the town centre. The Town Centre forms part of the Council's economic growth and regeneration strategy (Warrington Means Business) and there are specific proposals within the Local Transport Plan (LTP4) that support improved and sustainable connectivity to the town centre. In addition current focus on a potential hub for HS2 and Northern Power House rail connections support the drive to redevelop brownfield sites and regenerate the town centre. • The Council has also adopted a Town Centre Supplementary Planning Document (SPD) to support current and emerging Local Plan policy in order to facilitate the delivery of brownfield sites in the town centre. The SPD is concerned with design of new developments to ensure a good experience for those who live, work, have businesses, or visit the town
<ul style="list-style-type: none"> • The housing densities are not high enough within the town centre and the plan as a result it is not positively prepared. 	<ul style="list-style-type: none"> • The Council is confident that its assumptions about the development potential and capacity of sites in the Town Centre are robust. The Council has refined its density assumptions for the town centre in the following the conclusion of the Regulation 19 consultation in the update of its Strategic Housing Land Availability Assessment (SHLAA).
<ul style="list-style-type: none"> • The proposals do not trigger the regeneration of businesses in the Town Centre 	<ul style="list-style-type: none"> • The policy supports the regeneration of the town centre and the businesses within it in a number of ways including diversifying the role of the town centre by encouraging an increase in residential properties, encouraging new businesses and business locations, new cultural venues

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
	and cultural activities and identifying key development sites across the town centre. The policy will help harness investment from both public and private sectors and support regeneration strategies such as Warrington Means Business and the Town Centre Masterplan
<ul style="list-style-type: none"> • Plan for town centre is meaningless if the largest release of land for development under the plan is the other side of Manchester Ship Canal that effectively cuts off the development from the town centre. 	<ul style="list-style-type: none"> • The majority of the new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal. • The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from the proposed allocations in south Warrington.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • General support for regeneration of the town centre through brownfield regeneration. There is a view that the plans for the town centre should be more radical especially with regard to the loss of retail space and that there has been a failure to prioritise brownfield sites over Green Belt which is not sustainable. The development of town centre sites should mirror that of Manchester and Liverpool with more residential and leisure uses proposed that will attract younger buyers, with more affordable housing as opposed to expensive homes in Green Belt locations. 	<ul style="list-style-type: none"> • Support noted. • In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity, which was incorporated into the SHLAA. • Following consultation on the updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land, including in the town centre.

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Policy TC1 provides support bringing empty properties back into use and which support residential development in the town centre and other shopping centres, including vacant space above shops. • The Council has also adopted a Town Centre Supplementary Planning Document (SPD) to support current and emerging Local Plan policy in order to facilitate the delivery of brownfield sites in the town centre. The SPD is concerned with design of new developments to ensure a good experience for those who live, work, have businesses, or visit the town
<ul style="list-style-type: none"> • Housing densities should be higher in the town centre. Failure to set higher densities mean the plan is not sound as it is not positively prepared. 	<ul style="list-style-type: none"> • The Council is confident that its assumptions about the development potential and capacity of sites in the Town Centre are robust. The Council has refined its density assumptions for the town centre in the following the conclusion of the Regulation 19 consultation in the update of its Strategic Housing Land Availability Assessment (SHLAA).
<ul style="list-style-type: none"> • There is disconnect between growth and the town centre which contradicts ambitions to strengthen viability and vitality in the town centre. Plans for the stadium quarter and retail on the New Town House site reflect the muddled thinking of the plan. Proposals in south Warrington which cannot access the town centre do not support the town centre's regeneration. 	<ul style="list-style-type: none"> • The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential economic benefits of focussing development, including that proposed in south Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from south Warrington. Proposals to improve accessibility to the town centre will also improve access to Warrington Bank Quay and Warrington Central Rail Stations. • Plan for specific quarters have been established in the Town Centre Masterplan with more detail in respect of planning policy issues reflected in the Town Centre SPD. Policy TC1 seeks to embed the key principles of these documents into the Local Plan.
<ul style="list-style-type: none"> • The relocation of the Hospital would release a brownfield site for housing in the town centre. 	<ul style="list-style-type: none"> • The Plan gives specific consideration to Warrington Hospital. Policy INF4 (Parts 3 and 4) provides support for the development of a new hospital for Warrington. However, the review of NHS service delivery across the North West region is still at an early stage and there is insufficient

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
	certainty at present for this site to be included within the Council's identified residential or employment land supply. The Council is committed to working with the NHS Hospital Trust to deliver a new hospital either through redevelopment of the existing Lovely Lane site or on a new site.
Landowner/Developer	
<ul style="list-style-type: none"> • The owner of the proposed Fiddlers Ferry allocation welcomes the opportunity for the allocation to contribute to the town centre policy by making provision for public transport and active travel links into the town centre as Warrington's primary cultural and retail hub. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • The Council's supply of the land for the town centre contains unrealistic assumptions. The Town Centre policy relates to the Town Centre Supplementary Planning Document (SPD) which itself related to the current adopted plan, the relationship between the SPD and the new draft Local Plan is therefore unclear. The policy is also unjustified in requiring electric charging points on all developments, capacity which may never be used. 	<ul style="list-style-type: none"> • The Town Centre SPD is guidance to achieve good design, living conditions and a sustainable environment for the town centre which not only reflects the current adopted Local Plan but those challenges that the new draft Local Plan faces through revised NPFF guidance, climate change and achieving truly regenerative development proposals. Consultation on the SPD was undertaken in line with the Council's SCI and any elements of the new draft Local Plan policies that have been prepared to support the guidance in the SPD can be scrutinised through the Local Plan process. • The requirement for the provision of electric charging points is contained within the adopted Parking Standards SPD 2015. Electric cars will dominate in coming years as the Government's policy is to have only electric cars for sale by 2035 and any new cars to be able to be both conventionally and electrically charged from 2030. As the draft plan is to cover development up to and after 2038, it is therefore essential to provide for electric vehicles if developments are to meet future demand and environmental requirements.
<ul style="list-style-type: none"> • The Town Centre policy relies on an SPD that could lead to failure of the aspirations to deliver regeneration of the Town Centre. Both the emerging policy and SPD have not been tested against the viability of the 	<ul style="list-style-type: none"> • A concern of the Local Plan and the supporting Master Plan and the Council's Economic and Regeneration Strategy is to make development in the town centre truly transformative. Viability of town centre sites is

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
<p>sites within the Town Centre. The Viability Report for the Local Plan should be updated to include requirements of the SPD which puts financial burdens on sites. The SPD is not consistent with the PPG guidance on viability as it this guidance states that SPDs should not add unnecessary financial burdens on developments. The SPD is creating policy and should be tested at the Examination in public.</p>	<p>variable being dependent on locational advantages (for instance next to train stations and transport interchanges or riverside), contamination, access and existing quality of place (for example Palmyra Square). In ensuring that quality of development and place the SPD is supporting proposals that can truly raise the environmental value and viability of sites both now and in the longer term.</p> <ul style="list-style-type: none"> • Having no environmental standards for both setting and living in new developments will result in poorly conceived and designed developments and can lead to proposals that are based on speculative land valuations. There is a risk that too many residential units are proposed on site and land prices are as a result artificially inflated. This often sterilises sites in the long term as the values are rarely achieved and owner will wait for a speculative book value. If the land is developed on the basis of this type of proposal the reality of achieving an affordable variety of quality housing and attractive residential development in the town centre is lost. • Elements of the new draft Local Plan policies that have been prepared to support the guidance in the SPD can be scrutinised through the Local Plan process, including at the Examination in Public. • Following the consultation, the Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington.
<ul style="list-style-type: none"> • The draft Local Plan is failing to take an opportunity to promote the redevelopment of brownfield sites in the town centre. Allocations in the town centre should be identified within the policy which will give increased confidence in the redevelopment of sites in the town centre. 	<ul style="list-style-type: none"> • The Council considers that the Local Plan spatial strategy, Policy TC1 and the Town Centre SPD provide sufficient policy guidance for development in the Town Centre. As such there is no need for specific site allocations within the Town Centre.
<ul style="list-style-type: none"> • The Local Plan will not meet the qualitative need for housing including affordable housing and family housing in the Borough as it over relies on areas where viability of sites is compromised and proposes too many 	<ul style="list-style-type: none"> • Following the consultation, The Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
apartments. The Local Plan should allocate land in more viable areas and the contribution of the town centre should be moderated to reflect the limitations on town centre sites to meet qualitative housing needs. The Housing Delivery Test measurement, appeal decisions and continuous absence of a five year housing land supply all described within this representation clearly point towards alternative sources of housing land supply needing to be identified if Warrington's housing requirement is to be met in full during the plan period.	across the borough, including those in the town centre and inner Warrington. The Council is confident these sites will come forward and will compliment suburban and Green Belt release sites which together will provide a wide range of housing types to meet Warrington's needs. <ul style="list-style-type: none"> • The Council have also adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in order to facilitate the delivery of brownfield sites in the town centre. This SPD addresses the design and qualitative issues including environmental standards that should accompany town centre proposals so that town centre living can support a variety of house-holds types.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England welcomes the content of this policy including improving the role of the town centre and its environment and enhancing its 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Cheshire Constabulary comment the policy does not include any reference to measures to promote civil resilience, reduce incidents of crime in the town centre and increase the general public's feeling of safety. Measures to design out crime, including counter terrorism measures should be integral to development proposals particularly in public areas. Suggest the policy. The CCC suggests addition to the policy at part 7. With a new point f. incorporate measures for reduction in crime including Secure by Design and urban and landscape design solutions to mitigate the risk of potential terrorist attack. 	<ul style="list-style-type: none"> • The Council considers the Policy as currently written is sound. Detailed consideration of issues relating to security is provided in Policy DC6 – Quality of Place, with more specific guidance relating to the Town Centre contained within the Town Centre SPD.
Other	
<ul style="list-style-type: none"> • CPRE is broadly content with this policy. We welcome any enhancement of the Town Centre's environment as set out under bullet 7. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Cheshire Wildlife Trust supports clause 7b of the policy which requires development proposals to enhance the public realm and the environment. They would welcome more specific reference to measures to improve biodiversity for example green walls and roofs. This includes adjusting supporting text. 	<ul style="list-style-type: none"> • Support noted. Guidance on the provision of green walls and increasing biodiversity is contained in the supporting SPD which is referred to in the Town Centre policy.

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Rethinking South Warrington wish to see more emphasis on the town centre in the draft Local Plan to reduce the impact on Green Belt. 	<ul style="list-style-type: none"> • The regeneration of the Town Centre is key element of the Plan’s spatial strategy. TC1 has been prepared to support the extensive plans and ambitions that the Council has for the regeneration of the town centre. The Council has prepared and adopted a Town Centre Masterplan which identifies development opportunities in the town centre. The Town Centre forms part of the Council’s economic growth and regeneration strategy (Warrington Means Business) and there are specific proposals within the Local Transport Plan (LTP4) that support improved and sustainable connectivity to the town centre. In addition current focus on a potential hub for HS2 and Northern Power House rail connections support the drive to redevelop brownfield sites and regenerate the town centre. • The Council has also adopted a Town Centre Supplementary Planning Document (SPD) to support current and emerging Local Plan policy in order to facilitate the delivery of brownfield sites in the town centre. The SPD is concerned with design of new developments to ensure a good experience for those who live, work, have businesses, or visit the town. • In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity, which was incorporated into the SHLAA. • Following consultation on the updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is

Policy TC1 - Town Centre and Surrounding Area	
Summary of Issues Raised	Response
	confident the Local Plan will maximise the amount of development that is possible on brownfield land, including in the town centre.
<ul style="list-style-type: none"> • Stretton Neighbourhood Plan Group welcome the provisions of the policy especially in relation to town centre improvements. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Theatres Trust: The Trust is supportive of the objective of adding additional performance venues, which is a positive statement to enable greater diversity of uses within the town centre and support its vitality. Arts and cultural uses are increasingly important in maintaining footfall and bringing people into centres which in turn supports other businesses and minimises vacancies. They also contribute towards the cultural and social well-being of local people. 	<ul style="list-style-type: none"> • Comments duly noted.

Objective W4 To provide new infrastructure and services to support Warrington's growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The economic basis for the plan is unsound and is overly ambitious based on unsound assumptions. The ability of the plan to deliver planned infrastructure, regeneration and health and wellbeing is misunderstood and not achievable. Land proposed for development is not in the right place to serve resident needs and will not support strong vibrant communities. Employment and accessible housing is in the wrong place. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 is based on detailed evidence base assessing Warrington's future housing and employment land needs. The Council is not proposing an additional uplift to the housing requirement, as was the case with the previous PSVLP (2019), having considered the most up-to-date economic context, including the impacts of Brexit and COVID. • The Council considers that the spatial strategy and objectives provide an appropriate balance between economic, social and environmental objectives, in accordance with the requirements of the NPPF. • Having reviewed Warrington's future development needs and exhausted all potential brownfield sites, the Council considers that the UPSVLP has sought to minimise the amount of Green Belt land being released and has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. • To demonstrate that the required infrastructure will be delivered to support development within the UPSVLP, the Council has prepared a comprehensive Local Plan Viability Assessment, which takes into account required infrastructure contributions in assessing the viability of the Plan's site allocations across different parts of the borough. This is reflected in the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the infrastructure required to support new development. • The Council is confident that the spatial strategy of the plan is appropriate to meet the Borough's development needs.
<ul style="list-style-type: none"> • New infrastructure will not achieve both objectives to support growth and address congestion. New infrastructure will just shift the location of 	<ul style="list-style-type: none"> • The UPSVLP has been informed by LTP4 and the Warrington Multimodal Transport Model.

Objective W4 To provide new infrastructure and services to support Warrington's growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.	
Summary of Issues Raised	Response
<p>congestion and will continue to place demand on the existing highway network. New infrastructure will be insufficient to meet the increased demand created by new development.</p>	<ul style="list-style-type: none"> As part of the Local Plan Process, the Council has prepared a Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the UPSVLP. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the UPSVLP is appropriate. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.
Landowner/Developer	
<ul style="list-style-type: none"> W4 fails to give sufficient weight to the importance of providing public transport. 	<ul style="list-style-type: none"> The UPSVLP has been informed by LTP4 and the Warrington Multimodal Transport Model. Local Transport Plan 4 (LTP4) contains measures and proposals regarding sustainable travel and these have been embedded in the UPSVLP. LTP4 aims to reduce congestion and improve the environment through transformational transport policies and programmes intended to deliver a significant modal shift away from car use.
<ul style="list-style-type: none"> Object to transport policies under objective W4. The spatial strategy to deliver new homes will exacerbate dependency on the private car and will further impede the delivery of critical transport infrastructure to encourage shifts in travel behaviours. 	<ul style="list-style-type: none"> The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development, whilst reducing congestion and air pollution. The Local Plan will ensure the required infrastructure is delivered in a timely and coordinated manner. Local Transport Plan 4 (LTP4) contains measures and proposals regarding sustainable travel and these have been embedded in the UPSVLP. LTP4

Objective W4 To provide new infrastructure and services to support Warrington’s growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.	
Summary of Issues Raised	Response
	aims to reduce congestion and improve the environment through transformational transport policies and programmes intended to deliver a significant modal shift away from car use.
<ul style="list-style-type: none"> • Support Objective W4 	<ul style="list-style-type: none"> • Support noted
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	
Other	
<ul style="list-style-type: none"> • This should refer to an integrated transport provision. 	<ul style="list-style-type: none"> • The UPSVLP has been informed by LTP4 and the Warrington Multimodal Transport Model. • Local Transport Plan 4 (LTP4) contains measures and proposals regarding sustainable travel and these have been embedded in the UPSVLP. LTP4 aims to reduce congestion and improve the environment through transformational transport policies and programmes intended to deliver a significant modal shift away from car use.

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Plan promotes excessive growth (particularly in South Warrington) without certainty/viability of key infrastructure to support it. New road networks will increase traffic congestion and urban sprawl. 	<ul style="list-style-type: none"> • The Plan has been informed by both the Local Transport Plan (LTP4) and the Warrington Multimodal Transport Model. • As part of the Local Plan Process, the Council has prepared a Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the UPSVLP. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas. The Council also continues to review infrastructure requirements and delivery through the ongoing monitoring and update of its Infrastructure Delivery Plan. The Council is therefore confident that the infrastructure required to support the UPSVLP is capable of being delivered. In the event there are any future issues with infrastructure delivery, the Plan contains a review mechanism to address this.
<ul style="list-style-type: none"> • Location of development increases reliance on vehicle usage and already overstretched infrastructure. Impact on HGV's not considered in plan. No strategy to address increased pollution from increased traffic as a result of poor public transport links. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development, whilst reducing congestion and air pollution. The Local Plan will ensure the required infrastructure is delivered in a timely and coordinated manner. • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
	Action Plan, to ensure that opportunities to improve air quality are fully realised.
<ul style="list-style-type: none"> • Traffic infrastructure insufficient - no details in plan to ensure infrastructure is delivered before housing developments are built. 	<ul style="list-style-type: none"> • The Council has undertaken the preparation of a full Local Plan Viability Assessment in support of the UPSVLP. As part of this work, the Council reviewed all infrastructure requirements and costs for the all Local Plan allocations in consultation with developers promoting the allocations. This work demonstrates that the infrastructure required to support development is capable of being delivered. • The allocation policies will ensure the timely delivery of the required supporting infrastructure. This is important given the existing constraints on transport and community infrastructure in Warrington.
<ul style="list-style-type: none"> • Increased traffic resulting from the plan will mean increased reliance upon roads and bridges that are already congested. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development, whilst reducing congestion and air pollution. The Local Plan will ensure the required infrastructure is delivered in a timely and coordinated manner. • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. As such the Local Transport Plan identifies a specific work stream to begin the options assessment process for a new crossing within the first 5 years following its adoption.
<ul style="list-style-type: none"> • Internal and external walking and cycling links and funding for bus services might improve amenity of the area for residents BUT will do nothing to reduce car use and congestion and air, noise and light pollution. 	<ul style="list-style-type: none"> • The UPSVLP closely reflects the Council's Local Transport Plan (LTP 4), which aims to reduce congestion and improve the environment through transformational transport policies and programmes intended to deliver a significant modal shift away from car use. This is to ensure that investment in transport infrastructure helps to deliver the Local Plan's

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
	<p>Spatial Strategy and that the Main Development Areas, and other allocations in the Plan promote active transport options and are well served by public transport.</p> <ul style="list-style-type: none"> • Over the two years since the adoption of LTP4, the council has developed strategies for Walking, Cycling and Public transport through its Local Cycling and Walking Infrastructure Plan and Bus services Improvement Plan.
<ul style="list-style-type: none"> • No commitment to enhance the road network or congestion hot spots, or any understanding of the current transport problems across the Borough, and inability to cope with current traffic levels. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development, whilst reducing congestion and air pollution. The Local Plan will ensure the required infrastructure is delivered in a timely and coordinated manner.
<ul style="list-style-type: none"> • All the development assumes car usage, no alternative strategy for bus/walking/cycling etc. 	<ul style="list-style-type: none"> • The Plan has been informed by both the Local Transport Plan (LTP4) and the Warrington Multimodal Transport Model. • Local Transport Plan 4 (LTP4) contains measures and proposals to ensure sustainable travel is embedded in the UPSVLP. • It should also be noted that allocation policies contain specific measures to reduce dependency on the car, support public transport, cycling and walking.
<ul style="list-style-type: none"> • There must be complete transport infrastructure and LTP4 should be the master plan upon which the Local Plan is based. 	<ul style="list-style-type: none"> • The Plan has been informed by both the Local Transport Plan (LTP4) and the Warrington Multimodal Transport Model.
<ul style="list-style-type: none"> • The transport infrastructure requires a complete strategic review which will enable housing development on brown field sites first before Green Belt land is considered. 	<ul style="list-style-type: none"> • The Plan has been informed by both the Local Transport Plan (LTP4) and the Warrington Multimodal Transport Model. This along with the Council maximising the use of brownfield land to meet its development needs, means that the Council has demonstrated exceptional circumstances to

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
	justify Green Belt land to be released to meet development needs along with brownfield development.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • If the Local Plan is to meet its objective of creating sustainable places to live and work to address climate change then the absence of any major public transport proposals is a concern. If there is no expansion of the public transport network then development should be located near existing transport hubs in the Town Centre. 	<ul style="list-style-type: none"> • The Plan has been informed by both the Local Transport Plan (LTP4) and the Warrington Multimodal Transport Model. • Local Transport Plan 4 (LTP4) contains measures and proposals to ensure sustainable travel is embedded in the UPSVLP. For example, LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough. Over the two years since the adoption of LTP4, the council has developed more detailed strategies for Walking, Cycling and Public transport through its Local Cycling and Walking Infrastructure Plan and Bus services Improvement Plan.
<ul style="list-style-type: none"> • No reference to needing to cross the Bridgewater Canal or to the amount of traffic that uses the A49, or additional crossings of the Ship Canal. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development, whilst reducing congestion and air pollution. The Local Plan will ensure the required infrastructure is delivered in a timely and coordinated manner. • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. As such the Local Transport Plan identifies a specific work stream to begin the options assessment process for a new crossing within the first 5 years following its adoption.
<ul style="list-style-type: none"> • Train stations are located centrally in the Town which means that as a result there is a reliance on cars and more vehicular movements. 	<ul style="list-style-type: none"> • Whilst the lack of rail travel options in small parts of the Borough is accepted, the Council has adopted its Local Transport Plan 4 (LTP4) and it

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
	<p>contains measures and proposals to ensure sustainable travel is embedded in the Local Plan. For example, LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough. The infrastructure proposals to improve access into the Town Centre will therefore also improve access to Warrington Bank Quay and Warrington Central Train Stations.</p> <ul style="list-style-type: none"> • It should also be noted that the majority of the development proposed in the Local Plan is within the existing urban area and Inner Warrington, and therefore in relatively close proximity to Train Stations.
<ul style="list-style-type: none"> • It is highly unlikely that people will want to cycle to the South East Warrington Employment Area. 	<ul style="list-style-type: none"> • The Council recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling. Therefore, Policy INF1 and Policy MD6 make provision for the provision of effective cycle routes to and from the SEWEA to enhance the cycling experience.
<ul style="list-style-type: none"> • Policy has failed in the past and there is no alternative to car transport provided. 	<ul style="list-style-type: none"> • It is acknowledged that as Warrington developed in the past that brought with it the over reliance on the private car as a favoured mode of transport for the Borough's residents. However, The Council's Local Transport Plan 4 was progressed in parallel with the PSVLP (2019) to ensure both spatial strategies were integrated. • Local Transport Plan 4 (LTP4) contains measures and proposals to ensure sustainable travel is embedded in the UPSVLP. For example, LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough.
<ul style="list-style-type: none"> • The Local Plan and LTP 4 are no longer related. The laudable aspirations of LTP4 are not going to deliver the change of transport behaviour hoped for largely because LTP4 is focussed too much on travel to and from the Town Centre whereas this is not the reality of life for many residents. 	<ul style="list-style-type: none"> • The Plan has been informed by both the Local Transport Plan (LTP4) and the Warrington Multimodal Transport Model. It is therefore considered that the UPSVLP and LTP 4 are related and will make provision for changes in transport behaviour for people travelling around the Borough. The Warrington Multi-Modal Transport Modal used to test the impacts

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
	and proposed mitigations of the PSVLP (2021) is built using a detailed evidence base of existing travel patterns.
<ul style="list-style-type: none"> Plan's growth assumptions can't be accommodated by the existing transport infrastructure, or that set out in the IDP. 	<ul style="list-style-type: none"> The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development, whilst reducing congestion and air pollution. The Local Plan will ensure the required infrastructure is delivered in a timely and coordinated manner.
Landowner/Developer	
<ul style="list-style-type: none"> Developers promoting land not included in the Plan consider that the Policy will not be effective as the South East Warrington Urban Extension will fail to deliver necessary highway and public transport infrastructure, the proposed Fiddlers Ferry allocation is remote and detached from the main urban area of Warrington, and the proposed SEW Employment Area is isolated and will not be sustainable. 	<ul style="list-style-type: none"> The Plan has been informed by both the Local Transport Plan (LTP4) and the Warrington Multimodal Transport Model. Local Transport Plan 4 (LTP4) contains measures and proposals to ensure sustainable travel is embedded in the UPSVLP. In assessing options for development, the Council took into account the ability of potential development locations to integrate into existing transport networks in Warrington and the wider strategic transport network. As such the Council is confident that the site allocations in the Plan provide a sustainable basis to meet Warrington's growth, subject to the delivery of required supporting infrastructure set out in the allocation policies and the Infrastructure Delivery Plan. Complementing LTP4, all the UPSVLP allocation policies have measures requiring the provision of improved transport links, particularly in respect of public transport, walking and cycling.
<ul style="list-style-type: none"> Developers consider that Policy (part 1.g) is not aligned with the NPPF, as the NPPF is clear that development should only be prevented or refused on highways grounds if the residual cumulative impacts on the road network would be severe. 	<ul style="list-style-type: none"> The Council is of the opinion that the policy as written is consistent with the NPPF.

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • A developer promoting a Motorway Service Area supports the objective set out Policy INF 1 to “Improve the safety and efficiency of the transport network, tackle congestion, reduce carbon emissions and improve air quality”. However, Extra MSA Group do not consider that these objectives are fully reflected within the General Transport Principles in Part 1 of the policy, and accordingly seek amendments to Part 1 to ensure that the principles reflect the objective to improve the safety of the transport network. 	<ul style="list-style-type: none"> • The Council considers this to be a sound policy and fully addresses road safety issues.
<ul style="list-style-type: none"> • Developers recognise the potential benefits of futureproofing development, however; there can be no guarantee that some forms of new and emerging technology will ever reach the mass market. It is therefore difficult to foresee which forms of technology will need to be supported through development at the current time. 	<ul style="list-style-type: none"> • The UPSVLP covers an 18 year (inclusive) Plan period, and the policy requirement is considered acceptable to ensure fully futureproofed development is considered as part of the decision making process, where appropriate. It should be noted however that the Plan will be kept under review.
<ul style="list-style-type: none"> • A developer promoting land not included in the Plan considers that more development in Culcheth and on land adjacent to Glazebrook Train Station can be sustained as it satisfies and would adhere to the Policy principles of INF1. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington’s development needs as part of the Plan’s overall Spatial Strategy whilst ensuring the long term integrity of Warrington’s Green Belt.
<ul style="list-style-type: none"> • Developers unclear why the Council has chosen to include (4) protect future re-use of disused rail corridors; (5) improving freight transport provision; and (6) sustainable transport of minerals and waste within the policy. 	<ul style="list-style-type: none"> • Policy INF1 is a ‘strategic’ Local Plan Policy covering all forms of sustainable travel and transport options and it therefore the Council consider it an appropriate policy to cover the subject matter raised.
<ul style="list-style-type: none"> • Developers do not object to the principles of the draft Policy. However, would not support any policy requirements which threatened the viability and/or deliverability of development and request that these policies have subject to viability clauses inserting. 	<ul style="list-style-type: none"> • The Council has prepared a Local Plan Viability Assessment and reviewed the deliverability of the infrastructure requirements required to support the UPSVLP. As part of this work the Council has reviewed in detail the infrastructure requirements and costs for each of the Main Development Areas in consultation with developers promoting sites in these areas.

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The owners of the Fiddlers Ferry site consider this policy to be in line with national policy and welcome the opportunity to provide active travel links through the Fiddlers Ferry Masterplan. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • The promoters of land to the south of Birchwood Railway Station consider that policy should make reference to proposed improvements at Birchwood Train Station. 	<ul style="list-style-type: none"> • Whilst the principle of station improvements is supported, the Council considers that the planned reductions in service levels on the line would detract from any business case to support specific improvements at present. As such the Council considers it is premature to make specific reference to improvements in the Policy.
Statutory Consultees	
<ul style="list-style-type: none"> • St Helens Council: Welcomes this Policy, particularly the references within the Policy to impacts and opportunities beyond the Borough boundary with respect to general transport principals (including impacts on the Strategic Road Network) and walking and cycling facilities. However, there is currently no reference in the Policy to opportunities to improve public transport provision beyond the Borough boundary, where appropriate. • Also, with regard to the Parkside site in St Helens, Warrington Council's involvement in the Parkside Link Road project is noted and welcomed. 	<ul style="list-style-type: none"> • The Council is committed to working with St Helens on cross boundary issues, including in respect of public transport provision. The Council considers that the policy as written is sound, but will consider making reference to public transport provision as a suggested minor modification to the Inspector.
<ul style="list-style-type: none"> • Highways England: Supports this policy and the focus on non-car modes of travel and the requirement for Transport Assessments. Also welcome the inclusion of the recognition for schemes to mitigate impacts and to help improve the performance of the SRN, before development is brought in to use. 	<ul style="list-style-type: none"> • Comments duly noted.
Other	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust: Object to the proposals to deliver HS2 and Northern Powerhouse Rail (part 3.g). 	<ul style="list-style-type: none"> • The Council is committed to working with relevant Stakeholders to deliver these schemes for the benefit of the Borough.
<ul style="list-style-type: none"> • Warrington Climate Emergency Commission: Support the requirement for new developments to integrate electric vehicle charging infrastructure. However, suggest raising minimum requirements to align with LTP4 policies. 	<ul style="list-style-type: none"> • Comments duly noted, however, the specific standards are contained in the Parking Standards SPD and not the Local Plan.

Policy INF1 - Sustainable Travel and Transport	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Trans Pennine Trail Partnership: Provides robust policy guidance to ensure sustainable transport routes are incorporated, signed and fully accessible. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Campaign to Protect Rural England: Warrington is very poor in terms of its transport network and enabling walking and cycling due to its car domination. 	<ul style="list-style-type: none"> • It is acknowledged that as Warrington developed in the past that brought with it the over reliance on the private car as a favoured mode of transport for the Borough's residents. However, The Council's Local Transport Plan 4 was progressed in parallel with the PSVLP (2019) to ensure both spatial strategies were integrated. • Local Transport Plan 4 (LTP4) contains measures and proposals to ensure sustainable travel is embedded in the UPSVLP. For example, LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough. • Complementing LTP4 all the UPSVLP allocation policies have measures requiring the provision of improved transport links, particularly in respect of public transport, walking and cycling.
<ul style="list-style-type: none"> • British Horse Society: Policy fails to recognise Horse riding as a form of sustainable transport, and the policy principles (1b&e) risk excluding equestrians who are legitimate road users. 	<ul style="list-style-type: none"> • The Council considers this to be a sound policy. However, the Inspector might be minded to suggest minor modifications to the current policy as written to address this issue.

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Western Link will ease congestion and improve air quality. • Western Link will impact on the character of areas close by. 	<ul style="list-style-type: none"> • Comments duly noted. • The Western Link is the subject of a distinct and separate process outside of the Local Plan process and following the completion of outline design works a planning application for the scheme has been submitted. As part of the planning application process, issues such as the one raised will be assessed in line with local and national planning policies.
<ul style="list-style-type: none"> • The budget for a scheme as complex as the Western Link is unrealistic and the Outline Business Case is such that the scheme is undeliverable. This is compounded by the removal of Port Warrington and the South West Urban extension from the Plan which could have contributed funding towards its delivery. 	<ul style="list-style-type: none"> • The Council remains committed to the development of the Western Link and following the completion of outline design works has submitted a planning application for the scheme. Validation of this application is currently awaited as the Council is currently carrying out a Gateway Review with various parties, prior to progressing the full, detailed business case for submission to the Department of Transport. In accordance with para 59 PPG Plan Making, the Council is confident it is able to demonstrate that there is a reasonable prospect of the scheme being delivered. • In the event there is a more significant delay to the Western Link programme then the Council will address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review. The Council is confident that there would be sufficient time to undertake a review prior to the transport impacts becoming apparent and to address any issues with the Plan's housing land supply.
<ul style="list-style-type: none"> • Threat of Western Link has left residents facing the uncertainty of not knowing if they will lose their homes. 	<ul style="list-style-type: none"> • The Local Plan confirms the safeguarded route for the Western Link. The Council is promoting the scheme through a separate process to the Local Plan in its role as a Highways Authority and as part of that process is considering any claims for statutory blight.
<ul style="list-style-type: none"> • Not enough consideration given to the pollution caused by the Western Link, or whether this scheme is still needed. 	<ul style="list-style-type: none"> • The Western Link is the subject of a distinct and separate business case and assessment process, outside of the Local Plan process. However, it

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
	<p>has been tested as a committed highway scheme through the Council's Local Plan Multi Modal Transport Model.</p> <ul style="list-style-type: none"> • Detailed consideration of environmental impacts of the scheme will be assessed through the planning application process.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • The safeguarded route for the replacement Manchester Ship Canal high level bridge is ineffective as it is limited to the immediate approach to the bridge and makes no provision for wider improvements needed. 	<ul style="list-style-type: none"> • The purpose of the safeguarded route is to safeguard land from other forms of development and allow for a replacement crossing over the Ship Canal in this location. It is therefore considered that the identified safeguarding route is appropriate for the replacement of a high-level Ship Canal crossing, should one be needed in the future. It should be noted that this safeguarding route has been rolled forward from the Local Plan Core Strategy (2014).
<ul style="list-style-type: none"> • Question the ability of the Western Link to relieve existing congestion and serve the traffic generated by new development. 	<ul style="list-style-type: none"> • The Western Link is the subject of a distinct and separate business case and assessment process, outside of the Local Plan process. However, it has been tested as a committed highway scheme through the Council's Local Plan Multi Modal Transport Model.
<ul style="list-style-type: none"> • Delivery of the Western Link questionable as the budget is insufficient given the technical issues that will be faced in building the Western Link and the business case does not stack up. This is compounded by the removal of Port Warrington and the South West Urban extension from the Plan which could have contributed funding towards its delivery. 	<ul style="list-style-type: none"> • The Council remains committed to the development of the Western Link and following the completion of outline design works has submitted a planning application for the scheme. Validation of this application is currently awaited as the Council is currently carrying out a Gateway Review with various parties, prior to progressing the full, detailed business case for submission to the Department of Transport. In accordance with para 59 PPG Plan Making, the Council is confident it is able to demonstrate that there is a reasonable prospect of the scheme being delivered. • In the event there is a more significant delay to the Western Link programme then the Council will address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review. The Council is confident that there would be sufficient time to undertake a review prior

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
	to the transport impacts becoming apparent and to address any issues with the Plan's housing land supply.
<ul style="list-style-type: none"> • No consideration given to traffic growth from the Western Link or the congestion and air pollution it will cause in west Warrington. 	<ul style="list-style-type: none"> • The Western Link is the subject of a distinct and separate business case and assessment process (following government guidance), outside of the Local Plan process. However, it has been tested as a committed highway scheme through the Council's Local Plan Multi Modal Transport Model.
<ul style="list-style-type: none"> • Policy fails to understand current congestion and constraints on the current road network. 	<ul style="list-style-type: none"> • This is not the intention of the Policy. It is a policy to safeguard land (from other forms of development) that might be needed for future forms of transport infrastructure to support the Local Plan.
<ul style="list-style-type: none"> • There is no land safeguarded for sustainable public transport routes or quality cycling routes. 	<ul style="list-style-type: none"> • Policy INF2 includes a safeguarding for a Warrington east multimodal Corridor which safeguards land for future highway and public transport improvements. • Policy INF1 includes a policy to protect disused rail corridors from development which would prejudice the potential for the re-use of those areas for transport objectives, including the provision of public transport and sustainable transport schemes and / or corridors to support the sustainable growth of the Borough. • In addition LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy for the South East Warrington Urban Extension requires on site safeguarding of potential mass transit routes. The Council has also started the development of delivery plans for its Local Cycling and Walking Infrastructure Plan (LCWIP).
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • Support policy in principle. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Land at Birchwood Station should be safeguarded for a Park and Ride facility. 	<ul style="list-style-type: none"> • It is not considered that enough detail currently exists at present to warrant the safeguarding of land for a Park and Ride scheme.
<ul style="list-style-type: none"> • Policy will not be effective as the South East Warrington Urban Extension does not comply with the aspirations of the Council's Local 	<ul style="list-style-type: none"> • This is not the intention of the Policy. It is a policy to safeguard land (from other forms of development) that might be needed for future forms of transport infrastructure to support the Local Plan.

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
<p>Transport Plan and fails to deliver long term sustainable transport solutions.</p>	
<ul style="list-style-type: none"> • Not all the land at Wilson Pattern Street proposed for safeguarding is now needed because road improvements to Slutchers Lane have already been completed. 	<ul style="list-style-type: none"> • The safeguarding for Bridgefoot Link is to be retained in full. The Centre Park Link scheme provided an improved connection to Wilson Patten Street, but these do not allow an all movements junction at Wilson Patten Street. Future measures to improve connectivity in this area may be required as part of the Bridgefoot Link.
<ul style="list-style-type: none"> • Concerns that the safeguarded Western Link is considered essential to support the Plan's Spatial Strategy and a significant quantum of residential development. However, it still needs additional funding to be secured and once secured, it will take a considerable length of time to construct and therefore for housing completions to come forward. This is compounded by the removal of Port Warrington and the South West Urban extension from the Plan which could have contributed funding towards its delivery. 	<ul style="list-style-type: none"> • The Council remains committed to the development of the Western Link and following the completion of outline design works has submitted a planning application for the scheme. Validation of this application is currently awaited as the Council is currently carrying out a Gateway Review with various parties, prior to progressing the full, detailed business case for submission to the Department of Transport. In accordance with para 59 PPG Plan Making, the Council is confident it is able to demonstrate that there is a reasonable prospect of the scheme being delivered. • In the event there is a more significant delay to the Western Link programme then the Council will address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review. The Council is confident that there would be sufficient time to undertake a review prior to the transport impacts becoming apparent and to address any issues with the Plan's housing land supply.
<ul style="list-style-type: none"> • The Warrington East Multi-Modal Corridor Improvement safeguarded land should be deleted and the designation removed from the policies map. This route was first safeguarded over 20 years ago and spanned across a number of Plan periods; however, to date no proposals have come forward for the widening of Birchwood way. It is acknowledged that LTP4 makes reference to a Mass Transit system, however, no funding is currently in place and this idea is still at concept at this time. 	<ul style="list-style-type: none"> • The safeguarded route is required to ensure the future connectivity between the town centre and East Warrington can be improved, by all modes. The potential for this corridor to be used will be explored in more detail through study work committed to during the first 5 years of LTP4.

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
By virtue of the Council selling land within this safeguarding area, we are of the view that it can't be the case that the Council believes this land to be required to deliver road widening along Birchwood Way.	
Statutory Consultees	
<ul style="list-style-type: none"> • Sports England: Policy INF2 part 2. Possible impact on playing field location within plan 1 Warrington East Multi Modal corridor. 	<ul style="list-style-type: none"> • Any potential loss of provision will be dealt with, if and when, the safeguarding route is implemented.
Other	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust strongly object to the development of the Warrington Western Link as it likely to impact upon the Walton Locks Local Wildlife Site, Moore Nature Reserve Local Wildlife Site and habitats or land that is potentially functionally linked to the Mersey Estuary SPA and Ramsar site. 	<ul style="list-style-type: none"> • It is not the intention of this Policy to assess the impacts of development on sensitive sites. It is a policy to safeguard land (from other forms of development) that might be needed for future forms of transport infrastructure to support the Local Plan.
<ul style="list-style-type: none"> • Trans Pennine Trail: Some of the safeguarded routes will impact on the Trans Pennine Trail and it is important that the Trans Pennie Trail is involved in further consultation regarding these schemes when they come forward. 	<ul style="list-style-type: none"> • Comments duly noted, however; the time for further consultation on schemes on land safeguarded that might come forward in the future will be at the planning application stage.
<ul style="list-style-type: none"> • Rethinking South Warrington's Future: Risk to delivery of the Western Link gives rise to further concerns about congestion in the Borough. 	<ul style="list-style-type: none"> • The Council remains committed to the development of the Western Link and following the completion of outline design works has submitted a planning application for the scheme. Validation of this application is currently awaited as the Council is currently carrying out a Gateway Review with various parties, prior to progressing the full, detailed business case for submission to the Department of Transport. In accordance with para 59 PPG Plan Making, the Council is confident it is able to demonstrate that there is a reasonable prospect of the scheme being delivered. • In the event there is a more significant delay to the Western Link programme then the Council will address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review. The Council is confident that there would be sufficient time to undertake a review prior

Policy INF2 - Transport Safeguarding	
Summary of Issues Raised	Response
	to the transport impacts becoming apparent and to address any issues with the Plan's housing land supply.
<ul style="list-style-type: none"> • Lymm Neighbourhood Plan Group: Proposed Western Link will be of limited benefit to the majority of south Warrington and does not appear to provide routes for active travel. The Plan must include provision for replacement/overhaul of all ship canal crossings. 	<ul style="list-style-type: none"> • Comment duly noted, however; the Western Link scheme is a scheme to reduce traffic congestion around the Town Centre and will be of benefit to the Borough's residents. • Part 2b of Policy INF2 makes provision for safeguarded land to allow for the provision of a new or replacement high-level crossing of the Manchester Ship Canal.
<ul style="list-style-type: none"> • Trams for Warrington: Now that the South West Urban Extension and Port Warrington have been removed from the Plan, the business case for the Western Link is severely compromised. Such a scheme is highly complex, with an unrealistic budget, meaning the scheme will be undeliverable. 	<ul style="list-style-type: none"> • The Council remains committed to the development of the Western Link and following the completion of outline design works has submitted a planning application for the scheme. Validation of this application is currently awaited as the Council is currently carrying out a Gateway Review with various parties, prior to progressing the full, detailed business case for submission to the Department of Transport. In accordance with para 59 PPG Plan Making, the Council is confident it is able to demonstrate that there is a reasonable prospect of the scheme being delivered. • In the event there is a more significant delay to the Western Link programme then the Council will address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review. The Council is confident that there would be sufficient time to undertake a review prior to the transport impacts becoming apparent and to address any issues with the Plan's housing land supply.

Policy INF3 - Utilities and Telecommunications	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Broadband speed issues are a problem, especially when working from home. 	<ul style="list-style-type: none"> There are various Broadband providers across the Borough offering products to existing residents. Policy INF 3 Utilities & Telecommunications of the updated PSVLP (2021) makes provision for supporting the delivery of existing and emerging telecommunications (including Broadband) technology in new residential and employment developments. It is not a policy that will apply retrospectively in an attempt to upgrade existing services before any more growth will be allowed.
<ul style="list-style-type: none"> Infrastructure improvements needed for existing residents. 	<ul style="list-style-type: none"> Policy INF 3 Utilities & Telecommunications of the updated PSVLP (2021) is not a policy that will apply retrospectively in an attempt to upgrade existing infrastructure before any more growth will be allowed. There is however, where appropriate and necessary, the opportunity to request and secure s106 monies for infrastructure improvements to existing infrastructure, where new development will place pressure on current capacity limits.
<ul style="list-style-type: none"> Sewage infrastructure is outdated and needs improving to cope with increasing population and there should be an area wide sewage strategy that sits alongside and is integrated with sustainable drainage aspirations. There also needs to be strategic planning in Warrington for water storage infrastructure due to the impacts of climate change. 	<ul style="list-style-type: none"> Through the Duty to Cooperate as part of the Plan making process, extensive engagement has taken place between the Council and infrastructure providers as the Local Plan policies have evolved. It is therefore considered that the policy requirements of INF3 adequately cover the points raised.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> It is not clear as to the nature and extent of development required to facilitate new development. The Plan makes no reference to water supply which has been an issue in Warrington historically, delaying progress with development. There should be certainty as to how the concentration of development in south Warrington can be accommodated in line with the NPPF requirements. 	<ul style="list-style-type: none"> Through the Duty to Cooperate as part of the Plan making process, extensive engagement has taken place between the Council and infrastructure providers as the Local Plan policies have evolved. It is therefore considered that the policy requirements of INF3 adequately cover the points raised.
Landowner/Developer	
<ul style="list-style-type: none"> Policy considered to be in line with national policy. 	<ul style="list-style-type: none"> Comments duly noted.

Policy INF3 - Utilities and Telecommunications	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> It is not within the direct control of housebuilders or developers to provide Broadband infrastructure. The NPPF at paragraph 114 makes it clear that local planning authorities should support the expansion of electronic communication networks, however it does not seek to prevent development that does not have access to such networks. 	<ul style="list-style-type: none"> The policy as written does not seek to prevent development taking place that does not have access to Broadband infrastructure. There is a requirement in policy to ensure that engagement has taken place between developers and statutory undertakers and infrastructure providers to provide a strategy as to how infrastructure will be delivered.
Statutory Consultees	
<ul style="list-style-type: none"> Historic England: We welcome the requirement to ensure that there is no harm to heritage assets and the policy provides a framework to safeguard the Borough's heritage assets. 	<ul style="list-style-type: none"> Comments duly noted.
<ul style="list-style-type: none"> United Utilities: Request additional policy wording to co-ordinate the timing for the delivery of development with the timing for the delivery of new infrastructure/ infrastructure improvements through the development management process. Also request that any water and wastewater infrastructure in early phases of development should be designed to have regard to future interconnecting development phases. 	<ul style="list-style-type: none"> The Council considers that the Regulation 19 UPSVLP (2021) that it consulted on to be a 'Sound' Local Plan. Therefore, it is not proposing to make any further modifications ahead of submission of the Plan to the SoS for Examination in Public. However, the Inspector might be minded to suggest Main Modifications to the current policy as written as part of the Main Modification process, if they consider it necessary to make the Plan 'Sound'.
Other	
<ul style="list-style-type: none"> Cheshire Wildlife Trust: Support the requirement for infrastructure to be planned on the basis of site wide infrastructure strategies. 	<ul style="list-style-type: none"> Comments duly noted.
<ul style="list-style-type: none"> National Farmers Union: Much of the focus has been on delivering high speed broadband to towns and villages while farmers themselves still suffers from very poor broadband service. Better coverage is required to support farmers to maximise the opportunities that digital technology can provide for their businesses and to improve productivity. 	<ul style="list-style-type: none"> The policy is a Borough wide policy covering, Towns, Villages and the rural areas of the Borough, including areas that support the farming industry.

Policy INF4 - Community Facilities	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Concern that the plan does not demonstrate how new community infrastructure will be delivered. 	<ul style="list-style-type: none"> In Policy INF4 and in its allocation policies for housing sites, the Council has identified that developments will be expected to make a contribution to specified community infrastructure including schools, health and leisure facilities. The Council has also produced an Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support new development. To demonstrate that the required infrastructure will be delivered, the Council has prepared a comprehensive Local Plan Viability Assessment, which takes into account required infrastructure contributions in assessing the viability of the Plan's site allocations and a range of housing typologies across different parts of the borough.
<ul style="list-style-type: none"> The plan does not take into account the need for a new hospital or other medical facilities. 	<ul style="list-style-type: none"> Policy INF4 confirms that the Council and NHS Hospital Trust have identified a requirement for a new hospital for Warrington, either through the redevelopment of the existing hospital site or on a new site. If a new site is the Trust's preference then the Council will seek to allocate a suitable site through a future review of the Plan. The Trust are fully supportive of this policy approach. The Council has worked closely NHS Warrington CCG in the preparation of the Local Plan, particularly when considering the impact on primary care services for the future. As such the CCG is confident that the provision of new and expanded primary care facilities can be made in a timely manner to support the level and location of proposed development
<ul style="list-style-type: none"> New community facilities need to be in place before further development is delivered. 	<ul style="list-style-type: none"> Specific site allocation policies have provided detail as to when various elements of infrastructure are required to be delivered and where evidence is clear that this must be before any development takes place this has been specified. The Council is confident this will be mean that infrastructure is planned and delivered in a timely manner.
MP, Borough Councillor, Town or Parish Councillor / Council	

Policy INF4 - Community Facilities	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • New developments in south Warrington will need to incorporate a range of community facilities (health, leisure, education) in order to be sustainable. It is not clear how this will be delivered/funded and how it will be ensured that these services will be provided in a timely manner. 	<ul style="list-style-type: none"> • In Policy INF4 and in its allocation policies for housing sites, the Council has identified that developments will be expected to make a contribution to specified community infrastructure including schools, health and leisure facilities. The Council has also produced an Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support new development. • To demonstrate that the required infrastructure will be delivered, the Council has prepared a comprehensive Local Plan Viability Assessment, which takes into account required infrastructure contributions in assessing the viability of the Plan's site allocations and a range of housing typologies across different parts of the borough. • Where evidence shows it is necessary, the Council has specified that certain elements of infrastructure will need to be delivered prior to any development on major allocation sites or in respect of specific development phases. Further detailed on infrastructure delivery will be provided in the Development Frameworks which are required for each of the Main Development Areas.
<ul style="list-style-type: none"> • Vague reference to the possibility of a new hospital are inadequate. 	<ul style="list-style-type: none"> • Policy INF4 confirms that the Council and NHS Hospital Trust have identified a requirement for a new hospital for Warrington, either through the redevelopment of the existing hospital site or on a new site. If a new site is the Trust's preference then the Council will seek to allocate a suitable site through a future review of the Plan. The Trust are fully supportive of this policy approach. • The Council has worked closely NHS Warrington CCG in the preparation of the Local Plan, particularly when considering the impact on primary care services for the future. As such the CCG is confident that the provision of new and expanded primary care facilities can be made in a timely manner to support the level and location of proposed development

Policy INF4 - Community Facilities	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The hospital site offers a potential brownfield site for redevelopment. 	<ul style="list-style-type: none"> • Comment noted. Depending on the NHS Hospital Trust's preferred approach to upgrading hospital services the site may become available for redevelopment in future however this is not in the Council's control and the position will continue to be monitored.
<ul style="list-style-type: none"> • Not enough emphasis on the provision of doctors and dentists in the plan. 	<ul style="list-style-type: none"> • The Council has worked with NHS partners to ensure the provision of new and improved health facilities to support the level and location of proposed development. It is not within the scope of the Local Plan process to make specific provision for additional NHS professional staff.
<ul style="list-style-type: none"> • Not enough focus on the provision of education with the level of housing growth proposed. 	<ul style="list-style-type: none"> • The Local Planning Authority in determining the infrastructure requirements of new development, works with those agencies – both internal Council services and external partners - who are responsible for delivery of services including education and who have expertise in assessing future needs. This is reflected in the Plan (and in particular specific requirements are set out within site allocation policies) and the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify where new or expanded schools are required to support new development.
<ul style="list-style-type: none"> • The impact of development in South Warrington on community and other infrastructure is unacceptable. 	<ul style="list-style-type: none"> • The Local Planning Authority in determining the infrastructure requirements of new development works with those agencies – both internal Council services and external partners - who are responsible for delivery of services and who have expertise in assessing future needs. This is reflected in the plan (and in particular specific requirements are set out within site allocation policies) and the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support new development. • The Council is confident that site specific policies require the delivery of all elements of infrastructure necessary to support the development proposed in south Warrington. Further, the Local Plan Viability Assessment has demonstrated that the delivery of this new and improved infrastructure is viable.

Policy INF4 - Community Facilities	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Little evidence in the plan that a comprehensive review of infrastructure needs has taken place. 	<ul style="list-style-type: none"> • The Local Planning Authority in determining the infrastructure requirements of new development works with those agencies – both internal Council services and external partners - who are responsible for delivery of services and who have expertise in assessing future needs. This is reflected in the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support new development.
Landowner/Developer	
<ul style="list-style-type: none"> • Developers promoting land within the Garden Suburb allocation in the Previous PSVLP consider that INF4 will not be effective as only the former Garden Suburb allocation is able to deliver a District/Neighbourhood Centre to accommodate the necessary services and community facilities for a large housing area in south east Warrington. 	<ul style="list-style-type: none"> • The Local Planning Authority in determining the infrastructure requirements of new development works with those agencies – both internal Council services and external partners - who are responsible for delivery of services and who have expertise in assessing future needs. This is reflected in the plan (and in particular specific requirements are set out within site allocation policies) and the Infrastructure Delivery Plan (IDP) which has been developed with partners to identify the community infrastructure required to support new development. • The Council is confident that the requirements set out under Policy MD2 in support of the South East Warrington Urban Extension are appropriate and proportionate to the level of development proposed.
<ul style="list-style-type: none"> • The draft plan makes no specific reference to the need for new burial sites. The last one to open was Walton Lea Crematorium in 1964. Promote 4ha of land to the south of Fox Covert Cemetery as a sustainable option for a further site. 	<ul style="list-style-type: none"> • The Council is not aware of any evidence demonstrating that any specific provision needs to be made within the draft Local Plan.
<ul style="list-style-type: none"> • The objectives of INF4 will not be delivered in the town centre where there are known viability issues. 	<ul style="list-style-type: none"> • Following the consultation, the Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington. Where there are particular viability challenges for a specific site, then this can be assessed at the planning application stage. Indeed

Policy INF4 - Community Facilities	
Summary of Issues Raised	Response
	the need for new community infrastructure will vary in different parts of the town centre as it does borough-wide.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	
Other:	
<ul style="list-style-type: none"> • CPRE – support the policy principles. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Theatres Trust – supportive of Policy INF4 and consider it to address the requirements of the NPPF in relation to community, cultural and social facilities. We also welcome clarification that it applies to cultural facilities such as theatres, arts venues and those which support and facilitate performance such as community halls and pubs. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Stretton NDP – it is refreshing to see the needs of social and community infrastructure being addressed under this policy however the policy should also reference the need for developers to provide indoor accommodation for activities. 	<ul style="list-style-type: none"> • Support noted. The need for indoor community space has been considered and provided for within Policy INF4 and also the site specific allocation policies.
<ul style="list-style-type: none"> • Theatres Trust: Support policy and welcome the clarification that it applies to cultural facilities such as Theatres and Art venues. 	<ul style="list-style-type: none"> • Comments duly noted.

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Concerns that infrastructure will not be delivered due to lack of funding or not be provided in a timely manner, and that increased traffic, over-subscribed schools and health facilities will result. 	<ul style="list-style-type: none"> The Council in its allocation policies for housing sites has identified that developments will be expected to make a contribution to specified transport and community infrastructure including schools, health and leisure facilities. Policies for major developments also contain specific wording that states residential development will not be permitted to commence until funding for the required community infrastructure is agreed. To support its approach the Council has prepared a comprehensive Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. Reference should also be made to the Infrastructure Delivery Plan (IDP) which has been developed with partners – including Council and external partner service providers to identify the community infrastructure required to support new development.
<ul style="list-style-type: none"> Development in south Warrington will lead to an increase in car dependency and increased congestion. 	<ul style="list-style-type: none"> The Council has made clear through its allocation policies that impacts on the road network from development will need to be fully mitigated and specific improvements have been identified. Allocation Policy MD2 for the South East Warrington Urban Extension requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Warrington Multimodal Transport Model to ensure the transport network can accommodate the proposed level of growth. The allocation policy for the South East Warrington Urban Extension further includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together.

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • The figures in the IDP are not sound or justified. 	<ul style="list-style-type: none"> • The Infrastructure Delivery Plan (IDP) has been developed with partners – including Council and external partner service providers - to identify the community infrastructure required to support new development. The IDP is a ‘live’ document and will continue to be updated. The cost of the infrastructure identified has also been considered within the Local Plan Viability Assessment in order to demonstrate deliverability.
<ul style="list-style-type: none"> • There is no clear commitment to delivery of infrastructure. 	<ul style="list-style-type: none"> • The Council in its allocation policies for housing sites has identified that developments will be expected to make a contribution to specified community infrastructure including schools, health and leisure facilities. Policies for major developments also contain specific wording that states residential development will not be permitted to commence until funding for the required community infrastructure is agreed. To support its approach the Council has prepared a comprehensive Local Plan Viability Assessment and assessed the Plan’s policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. Reference should also be made to the Infrastructure Delivery Plan (IDP) which has been developed with partners – including Council and external partner service providers to identify the community infrastructure required to support new development.
<ul style="list-style-type: none"> • Funding for additional health infrastructure has been underestimated, particularly in south Warrington. 	<ul style="list-style-type: none"> • The Council in its allocation policies for housing sites has identified that developments will be expected to make a contribution to specified community infrastructure including health facilities. Policies for major developments also contain specific wording that states residential development will not be permitted to commence until funding for the required community infrastructure is agreed. This requirement has been informed by detailed input from NHS Warrington CCG as to the level of need in a particular area and the demand that will arise for new development.

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Concerns regarding capacity within the sewerage system. 	<ul style="list-style-type: none"> • Connections in to the existing sewerage system and the provision of infrastructure to facilitate this is a development cost taken on by the developer and is identified at planning application stage. The Council has not been made aware of any restrictions that would prohibit existing infrastructure being expanded in this regard. The Council has consulted with United Utilities throughout the Plan Making process.
<ul style="list-style-type: none"> • Concerns regarding traffic congestion in south Warrington. 	<ul style="list-style-type: none"> • The Council has made clear through its allocation policies that impacts on the road network from development will need to be fully mitigated and specific improvements have been identified. • Allocation Policy MD2 for the South East Warrington Urban Extension requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Warrington Multimodal Transport Model to ensure the transport network can accommodate the proposed level of growth. • The allocation policy for the South East Warrington Urban Extension further includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together.
<ul style="list-style-type: none"> • No additional crossings over the Manchester Ship Canal or Bridgewater Canal are referenced. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. This is identified in the Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough. • Whilst specific details of a connection across the Bridgewater Canal and/or Ship Canal have not yet been identified, Policy MD2 requires that contributions are made towards this so that it can be utilised when the

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
	Council is in a position to take this forward. This position will continue to be monitored.
<ul style="list-style-type: none"> • The plan needs to be more explicit in approach and contain appropriate mechanisms to ensure that piecemeal development of allocations does not circumvent the necessary contributions to infrastructure provision. 	<ul style="list-style-type: none"> • Policies for major developments contain specific wording that states residential development will not be permitted to commence until funding for the required infrastructure is agreed. Indeed development on larger sites will be informed by a Development Framework which will ensure the comprehensive delivery of infrastructure and where this is relevant it has been set out as a requirement within the allocation policies. To support its approach the Council has prepared a comprehensive Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. Reference should also be made to the Infrastructure Delivery Plan (IDP) which has been developed with partners – including Council and external partner service providers to identify the community infrastructure required to support new development.
<ul style="list-style-type: none"> • Absence of a CIL charging mechanism is a weakness. 	<ul style="list-style-type: none"> • The Council is considering the merits of a CIL mechanism and this will be addressed further post adoption of the plan. In the meantime the Council is confident that infrastructure needs associated with the UPSVLP have been fully considered and requirements for delivery have been set out in policy.
Landowner/Developer	
<ul style="list-style-type: none"> • Support for the clear identification of how appropriate infrastructure can be delivered to underpin the local plan's overall development strategy. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • The PSVLP 2021 fails to set out a clear and credible delivery strategy for the Western Link – a critical piece of infrastructure to deliver the Local Plan – and to address the significant challenges to funding this in the context of reduced development requirements. 	<ul style="list-style-type: none"> • The Council remains committed to the development of the Western Link and following the completion of outline design works has submitted a planning application for the scheme. Validation of this application is currently awaited as the Council is currently carrying out a Gateway Review with various parties, prior to progressing the full, detailed business case for submission to the Department of Transport. In

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
	<p>accordance with para 59 PPG Plan Making, the Council is confident it is able to demonstrate that there is a reasonable prospect of the scheme being delivered.</p> <ul style="list-style-type: none"> • In the event there is a more significant delay to the Western Link programme then the Council will address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review. The Council is confident that there would be sufficient time to undertake a review prior to any transport impacts becoming apparent and to address any issues with the Plan's housing land supply.
<ul style="list-style-type: none"> • Concern that the local plan in its current form will not deliver the necessary infrastructure due to viability issues, for example in the town centre. 	<ul style="list-style-type: none"> • The Council in its allocation policies for housing sites has identified that developments will be expected to make a contribution to specified community infrastructure including schools, health and leisure facilities. Policies for major developments also contain specific wording that states residential development will not be permitted to commence until funding for the required community infrastructure is agreed. To support its approach the Council has prepared a comprehensive Local Plan Viability Assessment and assessed the Plan's policies and site allocations together with all infrastructure that may be required to ensure it can be delivered and paid for in a timely manner. Reference should also be made to the Infrastructure Delivery Plan (IDP) which has been developed with partners – including Council and external partner service providers to identify the community infrastructure required to support new development. • Following the consultation, the Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington.

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Support for reference to the consideration of viability at planning application stage as necessary. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Lack of transparency in IDP with no specific breakdown as to how figures have been derived and no means to address current funding gaps. 	<ul style="list-style-type: none"> • The Infrastructure Delivery Plan (IDP) has been developed with partners – including Council and external partner service providers - to identify the community infrastructure required to support new development. The IDP is a 'live' document and will continue to be updated. The cost of the infrastructure identified has also been considered within the Local Plan Viability Assessment in order to demonstrate deliverability.
<ul style="list-style-type: none"> • The list of matters that contributions will be sought for should be refined. It is noted within the policy that the list is not exhaustive and so the list should be limited to matters referred to in the NPPF – for example reference to public art should be removed. 	<ul style="list-style-type: none"> • The Council is confident that the policy a worded will allow the consideration of contributions towards appropriate infrastructure. Indeed this will be assessed on a site-by-site basis at planning application stage.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England - Welcome reference to heritage assets in the list of potential matters to be funded by planning contributions. The town has number of assets on the Heritage at Risk Register and we welcome the opportunity to safeguard them through this policy. 	<ul style="list-style-type: none"> • Comments noted.
<ul style="list-style-type: none"> • Environment Agency - Support the inclusion of flood defence and alleviation schemes (including SuDS), biodiversity enhancements and waste management in the list of infrastructure to be funded by planning contributions. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • National Highways – Support Policy INF5. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Sport England – highlights that key evidence informing the policy should refer to Playing Pitch Strategy (updated 2019) and the Sports Facilities Strategic Needs Assessment (2014). 	<ul style="list-style-type: none"> • The Council accepts this is an omission and will propose a minor modification to make reference to these documents.
<ul style="list-style-type: none"> • Cheshire Constabulary - Recognition in INF5 that the Council will seek planning obligations where development creates a requirement is 	<ul style="list-style-type: none"> • Support noted. The Council will engage with the Cheshire Constabulary to consider their future needs and the list of matters referred to is caveated to note that the list is not exhaustive. The Council is not aware at the

Policy INF5 - Delivering Infrastructure	
Summary of Issues Raised	Response
welcomed and supported. However, request that emergency services is included in the list of recipients.	current time of any evidence to demonstrate that specific emergency services provision needs to be made through the local plan.
Other	
<ul style="list-style-type: none"> • CPRE – broadly supportive of the requirements of this policy. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Lymm Neighbourhood Plan Group – not clear how schools in Lymm will accommodate the level of development proposed and leisure facilities in south Warrington are already lacking. 	<ul style="list-style-type: none"> • The Council in its allocation policies for housing sites has identified that developments will be expected to make a contribution to specified community infrastructure including schools and leisure facilities. Policies for major developments also contain specific wording that states residential development will not be permitted to commence until funding for the required community infrastructure is agreed.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust – Supports reference to biodiversity, open space, green infrastructure and allotments and also the requirement for viability assessments submitted by developers to be ‘open book’. 	<ul style="list-style-type: none"> • Support noted.

Policy INF6 – Aerodrome Safeguarding	
Summary of Issues Raised	Response
Residents	
• None.	• None.
MP, Borough Councillor, Town or Parish Councillor / Council	
• None.	• None.
Landowner/Developer	
• None.	• None.
Statutory Consultees	
<ul style="list-style-type: none"> • Manchester Airport Group: Strongly support policy INF6 and its inclusion in the Plan is justified, with the policy wording being robust and encompassing all aspects of Aerodrome safeguarding. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Mineral Products Association: This policy and the supporting text in paragraph 7.6.3 appear to infer a blanket ban on mineral extraction within the 13km safeguarding of Manchester Airport or the Manchester Radar. Firstly the policy is not worded positively and secondly we object to this. We recognise the safety requirements associated with airports but the Safeguarding zones do not preclude mineral extraction and policy should be amended to reflect this. 	<ul style="list-style-type: none"> • The Council considers the Local Plan as written to be ‘sound’. The wording does not provide a blanket ban on mineral extraction. The wording qualifies the types of development which would be precluded.
Other	
• None.	•

Objective W5 - To secure high quality design which reinforces the character and local distinctiveness of Warrington's urban area, its countryside, its unique pattern of waterways and green spaces and its constituent settlements whilst protecting, enhancing and embracing the Borough's historic, cultural and built and natural assets.	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The Plan must address climate change and address how carbon reduction can be achieved and a net zero target shall be met. 	<ul style="list-style-type: none"> • Objective 6 and the policies in the plan supporting its delivery sets out the Council's commitment to reducing carbon emissions and making development resilient to climate change.
<ul style="list-style-type: none"> • Increased reliance on road transport is inconsistent with the UK's and the Council's objectives on climate change. 	<ul style="list-style-type: none"> • Local Transport Plan 4 (LTP4) contains measures and proposals regarding sustainable travel and these have been embedded in the UPSVLP. LTP4 aims to reduce congestion and improve the environment through transformational transport policies and programmes intended to deliver a significant modal shift away from car use.
<ul style="list-style-type: none"> • Character and distinctiveness will be considerably diminished. Historic and cultural assets will be harmed. 	<ul style="list-style-type: none"> • It is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development. • For allocated sites, Heritage Impact Assessments have been prepared to identify heritage assets within the site and in close proximity that may be impacted by development, with specific mitigation measures identified and the mitigation requirements written in to allocation policies to protect them. • Policy DC6 promotes good design in all development and specifies that design layouts should make a positive contribution to local character and distinctiveness in the surrounding area.
Landowner/Developer	
<ul style="list-style-type: none"> • W5 is supported. It is essential to secure high-quality design. 	<ul style="list-style-type: none"> • Support noted
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England supports the objective. 	<ul style="list-style-type: none"> • Support noted
Other	

Objective W5 - To secure high quality design which reinforces the character and local distinctiveness of Warrington's urban area, its countryside, its unique pattern of waterways and green spaces and its constituent settlements whilst protecting, enhancing and embracing the Borough's historic, cultural and built and natural assets.

Summary of Issues Raised	Response
<ul style="list-style-type: none">• The CPRE supports the objective.	<ul style="list-style-type: none">• Support noted

Policy DC1 - Warrington's Places	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Policy does not offer protection to valuable places and their distinct character. 	<ul style="list-style-type: none"> • Together with the other policies in the Plan, the Council is confident that the Policy provides the necessary protection to protect the distinct character of the places referenced in the Policy. The policy sets out the unique attributes of these spatial areas, details the strategy for each one over the plan period and promotes the preparation of Neighbourhood Plans to provide more detailed local policies for these areas where relevant.
<ul style="list-style-type: none"> • The Plan will damage the character of Warrington's suburbs. It is not justified to say that new development will not have an impact on health and air quality. 	<ul style="list-style-type: none"> • The main thrust of the policy for Warrington's suburbs is to protect residential amenity and ensure new development is in keeping with its established surroundings. The Council has ensured that air quality and health and wellbeing issues have been fully considered in the preparation of the Updated PSVLP 2021.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The list of visitor attractions in Warrington does not reflect key assets in South Warrington, these should include: Trans-Pennine Trail, The Bridgewater Canal Corridor, Grappenhall Walled Garden, Grappenhall Village, Lymm Village and Lymm Dam. These attractions draw visitors from across the Borough and beyond. These sites are amongst those which have been vital to the health and wellbeing of the towns' residents during the pandemic. The function of these places needs to be recognised and protected. 	<ul style="list-style-type: none"> • The policy at point 7 identifies Warrington's circular parklands that connect inner Warrington to outer areas. This encompasses many features such as the Trans Pennine Trail and the Bridgewater corridor and seeks to support, enhance and promote them. In addition the policy at point 8, 9 and 10 refers to the countryside and settlements of Warrington and includes support and protection for them in terms of their setting and relationship with surrounding urban and countryside settings.
<ul style="list-style-type: none"> • The allocation of Green Belt land around outlying settlements will not meet this policy as it will alter the historic character of the areas and their natural environment. There is not enough detail in the South East Warrington Urban Extension policy and this gives no assurance the semi-rural character of the area will be retained. 	<ul style="list-style-type: none"> • All the land allocation policies in the outlying settlement have requirements that expect any development coming forward to consider the historic setting of the areas concerned. • The South East Warrington Urban Extension allocation policy requires that a Development Framework be prepared for the area and that this be consulted on this will include how any development is formed and how it relates to the semi-rural nature of the area.

Policy DC1 - Warrington's Places	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Provisions of the policy welcomed. However, Stretton should be protected and adjacent development should not be allowed. Stretton should be protected from inappropriate development. 	<ul style="list-style-type: none"> • Support noted • The policy is worded to support the varying scales and characteristics of Warrington's settlements and the importance of the surrounding countryside. The policy provides broad strategic parameters and intentions for different areas of the borough and allows for more detailed policies and guidance through the production of Neighbourhood Plans or masterplans. It should be noted that the allocation policy for the South East Warrington Urban Extension, which borders Stretton, requires the preparation of a more detailed framework which will provide the opportunity for more detailed consideration of design principles.
Landowner/Developer	
<ul style="list-style-type: none"> • The University of Chester would like the areas of the Padgate campus removed from the Plan's Green Infrastructure designations. This will allow maximum flexibility under DC1 to consider development on the sites which are in the suburban area and offers chances for infill development. 	<ul style="list-style-type: none"> • The land designated under DC3 and DC5 has been identified important in supporting ecological networks, mitigating climate change and important in meeting future demand for green infrastructure where there are shortfalls. DC5 seeks to ensure that open space and sports provision will be protected to meet with borough and local requirements. The Council has taken the approach in line with NPPF guidance and with national guidance on the audit and assessment of open space, outdoor sport and recreation and it does not consider that these areas should be unallocated.
<ul style="list-style-type: none"> • In order to give increased confidence to the market and promote redevelopment of these urban locations, a bespoke allocation for the site(s) in the Town Centre Masterplan would be both welcome and encouraged. 	<ul style="list-style-type: none"> • The Council considers that the Local Plan spatial strategy, Policy TC1 and the Town Centre SPD provide sufficient policy guidance for development in the Town Centre. As such there is no need for specific site allocations within the Town Centre.
<ul style="list-style-type: none"> • It would be helpful if this policy could cite those areas where a Neighbourhood Plan has been made or is in the process of being prepared. If such plans exist or are to come into place, the NPPF confirms that strategic policies should consider what level of development should 	<ul style="list-style-type: none"> • It is not considered necessary to list Neighbourhood Plans in the policy. Full details on the status of adopted and emerging Neighbourhood Plans are provided on the Council's web site.

Policy DC1 - Warrington's Places	
Summary of Issues Raised	Response
<p>be afforded to neighbourhood plan areas in line with paragraph 66 of the NPPF.</p>	
<ul style="list-style-type: none"> Richborough Estates does not object to the principles of the draft Policy. However, Richborough Estates would not support any policy requirements which threatened the viability and/or deliverability of development and request that these policies have subject to viability clauses inserting. 	<ul style="list-style-type: none"> The Updated PSVLP 2021 is supported by a comprehensive Local Plan Viability Assessment (2021). If an applicant is able to demonstrate through a site specific viability appraisal that there are genuine viability issues with a proposed development, then the Plan provides flexibility for these to be addressed.
<ul style="list-style-type: none"> In respect of criterion (e), Policy DEV1 requires higher minimum densities in centrally located areas, with a minimum of 130 dwellings per hectare in the Town Centre and 50 dwellings per hectare on sites that are within the wider Town Centre Masterplan area. This will result in a far greater proportion of apartments coming forward in such locations, which limits the potential to provide a wide range of tenures and types of dwellings. 	<ul style="list-style-type: none"> It is understood that the density of dwellings and viability will impact on the type and tenure of in the town centre and inner areas. There are however a variety of locations which offer up different opportunities for example riverside/canal side locations and sites adjacent to transport hubs that will benefit from future proposals around the Northern Power House rail proposals and HS2, plus existing residential attractive town centre areas such as Palmyra square. The policy supports the long term provision of housing in the inner areas and the regeneration of those areas through supporting planning guidance including the Town Centre SPD. The Central Six Regeneration Strategy and the Town Centre Masterplan are also in place to encourage comprehensive redevelopment that adds value and creates an environment that is attractive to different cohorts in the housing market. In this way both the type and tenure of property will be become more mixed in a very liveable environment.
<ul style="list-style-type: none"> With reference to criterion (f), Policy DEV2 requires 20% affordable housing provision on sites within Inner Warrington, but there are known viability concerns in this area, which could have the effect of limiting the quantum of affordable housing being delivered in Inner Warrington. Affordable housing for families would be further limited because of the combination of viability concerns and the requirement to deliver high density schemes in Inner Warrington in accordance with Policy DEV1. 	<ul style="list-style-type: none"> Following the consultation, The Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate credible scenarios where affordable housing can be delivered in the town centre and in inner Warrington. The Council is confident these sites will come forward and will compliment suburban and Green Belt release sites which together will provide a wide range of housing types to meet Warrington's needs.

Policy DC1 - Warrington's Places	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • There are also other sources of affordable housing supply, including developments by Registered Providers and the Council's Housing Company which are likely to deliver a much higher proportion of affordable housing. For example, Torus are bringing forward a number of affordable housing schemes in the Town Centre with grant funding from Homes England. Torus are also using grant funding to deliver additional affordable homes on private development sites, over and above those secured through S106. • The Council have also adopted a Town Centre Supplementary Planning Document to support current and emerging Local Plan policy in order to facilitate the delivery of brownfield sites in the town centre. This SPD addresses the design and qualitative issues including environmental standards that should accompany town centre proposals so that town centre living can support a variety of house-holds types.
<ul style="list-style-type: none"> • Bellway supports the approach to the inset settlements (including Winwick) to be protected in terms of their relationship with the main urban area and their individual scale and function. The commitment to accommodating some new development outside of the existing settlement boundary through release of Green Belt is welcomed. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • NWLI considers that Policy DC1, and in particular the strategy for the areas designated as 'Suburban Warrington', including the Site to be sound. 	<ul style="list-style-type: none"> • Support noted
Statutory Consultees:	
<ul style="list-style-type: none"> • Historic England welcome the inclusion of this policy. The policy provides a positive framework as required by the NPPF that would help safeguard the Borough's historic environment when dealing with development proposals. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • The Environment Agency support the protection the role of Victoria Park has on flood risk management/ 	<ul style="list-style-type: none"> • Support noted

Policy DC1 - Warrington's Places	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Cheshire Constabulary requests In order for the policy to be effective, that the following text be added to the list of development requirements in Part 2. "j. Include crime prevention and reduction measures." 	<ul style="list-style-type: none"> The Council considers that this issue is appropriately dealt with in Policy DC6 Quality of Place.
Other	
<ul style="list-style-type: none"> CPRE is broadly supportive of the policy, particularly the points concerning Countryside and Settlements 	<ul style="list-style-type: none"> Support noted
<ul style="list-style-type: none"> Stretton NP group welcome the provisions of the policy. However, the group feel that Stretton should be protected and adjacent development should not be allowed. Stretton should be protected from inappropriate development. 	<ul style="list-style-type: none"> Support noted The policy is worded to support the varying scales and characteristics of Warrington's settlements and the importance of the surrounding countryside. The policy provides broad strategic parameters and intentions for different areas of the borough and allows for more detailed policies and guidance through the production of Neighbourhood Plans or masterplans. It should be noted that the allocation policy for the South East Warrington Urban Extension, which borders Stretton, requires the preparation of a more detailed framework which will provide the opportunity for more detailed consideration of design principles.
<ul style="list-style-type: none"> Cheshire Wildlife Trust broadly supports the policy. Cheshire Wildlife Trust suggests that developers of sites in inner Warrington should be encouraged in supporting biodiversity through green walls etc.; it should be made clear developers will be expected to fund the circular parklands; it could be made clear that the release of Green Belt refers solely to the removal of sites in the draft plan, biodiversity should be added to requirements of Victoria Park, Gulliver's World and Walton Hall. Also a stronger phrase than 'have regard' to i.e. 'to comply with in clauses' 13 and 16 is suggested to match the wording in the NPPF. 	<ul style="list-style-type: none"> Other policies, including DC3 and DC5 deal with biodiversity as do individual allocation policies. The Town Centre SPD provide specific guidance on the use of SUDs, green walls and the adoption of other design approaches that support diversity. It is intend to revise current Design and Construction SPD to included measures to support biodiversity in building design and the Council has also confirmed that it will give consideration to the preparation of an SPD to provide additional detail on the Council's approach to green infrastructure and Warrington's ecological network.

Policy DC2 - Historic Environment	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Two buildings (Cotebrook House & Lymm Hotel) in Lymm that are registered on the Council's Local List at Appendix 5 of the Local Plan have already been demolished due to allow other developments to take place. 	<ul style="list-style-type: none"> • The Council is committed to a review of its Local List through part 3a of policy DC2. This will be a separate process once the Local Plan has been adopted, where there will be an opportunity for people and organisations to submit details of assets they wish to be considered for inclusion, or removal from the Council's Local List.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The 2014 adopted Local Plan allowed for the continuous protection of the countryside and settlements through the Green Belt allocation. The proposed submission version makes no mention of preserving the Green Belt. And only states that 'Warrington's places will be maintained and enhanced...' The scale of development proposed will lead to the loss of the historic landscape. Local Planning should identify and assess the significance of local heritage where impacted by proposals for development. Development should be resisted unless public benefit outweigh harm. 	<ul style="list-style-type: none"> • It is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development. • For allocated sites, Heritage Impact Assessments have been prepared to identify heritage assets within the site and in close proximity that may be impacted by development, with specific mitigation measures identified and the mitigation requirements written in to allocation policies to protect them. • The relevant Local Plan policies and Heritage Impact Assessments have been shared with and agreed by Historic England as part of the Local Plan process. This includes agreement on the appropriate mitigation measures, where required to ensure that policies are in line with the requirements of the NPPF.
<ul style="list-style-type: none"> • The proposals conflict with the concept of the protection of the town's historic environment and heritage assets. The proposed allocations give rise to conflict with the character and appearance of a number of conservation areas and other designated heritage assets. Allocations will undermine the significance of a range of heritage assets. 	<ul style="list-style-type: none"> • It is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development. • For allocated sites, Heritage Impact Assessments have been prepared to identify heritage assets within the site and in close proximity that may be impacted by development, with specific mitigation measures identified and the mitigation requirements written in to allocation policies to protect them.

Policy DC2 - Historic Environment	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> The relevant Local Plan policies and Heritage Impact Assessments have been shared with and agreed by Historic England as part of the Local Plan process. This includes agreement on the appropriate mitigation measures, where required to ensure that policies are in line with the requirements of the NPPF.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> Concern from developers objecting to the Thelwall Heys allocation that the allocation is contrary to components of Policy DC2, in particular reference to the Bridgewater Canal under part 2d and the policy expectations under Part 4 of this policy, which confirms that harm to heritage assets will only be permitted where this is clearly justified and outweighed by the public benefits of the proposal. 	<ul style="list-style-type: none"> It is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development. For allocated sites, Heritage Impact Assessments have been prepared to identify heritage assets within the site and in close proximity that may be impacted by development, with specific mitigation measures identified and the mitigation requirements written in to allocation policies to protect them. The relevant Local Plan policies and Heritage Impact Assessments have been shared with and agreed by Historic England as part of the Local Plan process. This includes agreement on the appropriate mitigation measures, where required to ensure that policies are in line with the requirements of the NPPF.
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> Historic England: We welcome the inclusion of a policy for the historic environment in the Warrington Local Plan. The policy sets out its strategy based on elements which contribute to Warrington's distinct identity and sense of place. In addition, we consider that Para 4 to 8 will provide an appropriate framework on which to guide the assessment of applications that affect Warrington's historic environment. 	<ul style="list-style-type: none"> Comments duly noted and the Council welcomes the support provided from Historic England through the Plan making process, in developing Plan policies and associated Heritage Impact Assessments.

Policy DC2 - Historic Environment	
Summary of Issues Raised	Response
<i>Other</i>	
<ul style="list-style-type: none"> • CPRE: There is important industrial heritage and railway history connected with the world's first commercial railway, the Chat Moss Line, and the Local Plan needs to protect and enhance this through policy. 	<ul style="list-style-type: none"> • It is considered that policy DC2 is an appropriate policy to ensure that the Borough's historic environment is protected, enhanced and proactively managed, whilst supporting appropriate, sustainable development.

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Man-made, “value engineered” alternatives will go no way to replacing replace green spaces lost as a result of development. 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a revised Habitat Regulations Assessment (2021) to ensure that there are no impacts on designated European sites or that any impacts can be mitigated. Ecological assessments have also been produced by a number of developers promoting sites proposed to be allocated in the Local Plan and where necessary, these have been reviewed by the Council’s ecological consultants. It should also be noted that provision is made in the allocation sites for Biodiversity Net Gain, and compensatory Green Belt improvements.
<ul style="list-style-type: none"> • The policy does not meet the needs of the area. It does not provide enough protection for the environment. The infrastructure budget shows a lack of commitment to green infrastructure. The wording of the policy is open to interpretation by developers. 	<ul style="list-style-type: none"> • In preparing the Plan, the Council has worked closely with statutory consultees including, Natural England and the Environment Agency to ensure the potential impact of development on the environment has been appropriately assessed and that mitigation measures are to the required standard.
<ul style="list-style-type: none"> • Mentioning opportunities for links to the Trans Pennine Trail is not a plan. The Plan should say something along the lines of “We will create active travel links to the upgraded Trans Pennine Trail”. 	<ul style="list-style-type: none"> • Policy DC3 is an over-arching green infrastructure. There are other policies in the Plan, both within the transport policies contained in Chapter 7 and the site allocation policies contained in Chapter 10 that identify specific links/connections that should be made to the Trans Pennine Trail.
<ul style="list-style-type: none"> • Specific consideration need to be given to the needs of the horse riding community. 	<ul style="list-style-type: none"> • New and improved Green Infrastructure across the borough will provide opportunities for horse riding.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • There is no evidence of a systematic ecological assessment in south Warrington. The HRA is similar to that used for the 2014 Local Development Plan which concentrates on SSSIs some which are out of the Borough. There is no statement in the proposed plan of how the WBC expects to preserve the ecology and benefits of the 1,715 hectares of Green Belt land in Appleton Parish that will be destroyed as part of the allocation policies. 	<ul style="list-style-type: none"> • It is not the purpose of a Habitat Regulations Assessment (HRA) to assess all of the ecological/environmental issues of the proposed Plan. The need for Appropriate Assessment is set out by the Conservation of Habitats and Species Regulations 2017 (as amended) and is retained in the EU Exit Regulations 2019. The purpose of a HRA is to assess the impact of a plan or project on European sites only.

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is supported by a revised Habitat Regulations Assessment (2021). Ecological assessments have also been produced by a number of developers promoting sites proposed to be allocated in the Local Plan and where necessary, these have been reviewed by the Council's ecological consultants. • The site allocation policies, where relevant, require more detailed ecological assessments to be carried out prior to development coming forward. They also require biodiversity net gain and compensatory improvements to the accessibility and environment quality of land remaining in the Green Belt where the loss of Green Belt land is proposed. • The development requirements were revised in the Updated PSVLP 2021 and the Council is only proposing to release 580ha (5%) of land from the Green Belt as compared to 1,210ha (11%) in the PSVLP 2019.
Landowner/Developer	
<ul style="list-style-type: none"> • The landowner promoting the Fiddlers Ferry allocation supports the policy in principle, noting that the Local Plan is allocating over 50% of the land asset at Fiddlers Ferry to new parkland space which will deliver a major new green infrastructure asset with public access to the Mersey riverside and improved links to the Trans Pennine Trail and the St Helen's Canal. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • A number of developers consider that parts of this policy will need to be redrafted in the context of the recent Environment Act 2021. 	<ul style="list-style-type: none"> • The Council considers that the Updated PSVLP 2021 is consistent with the Environmental Act 2021. Additional detail can be addressed through the preparation of an SPD or a future review of the Plan.
<ul style="list-style-type: none"> • Developers previously included in the Garden Suburb Allocation in the 2019 PSVLP consider that that the policy should list the opportunity to deliver a significant Country Park around Grappenhall in accordance with the need for a comprehensive, masterplanned approach to the Warrington Garden Suburb/South East Urban Extension area (See comments on MD2). 	<ul style="list-style-type: none"> • Appropriate provision for green infrastructure is made within Policy MD2 South East Warrington Urban Extension.

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The owner of land at Newcombe Avenue, Orford object specifically to the inclusion of the Site within the area covered by the policy. This is because the Council’s own evidence base does not support the identification of the site as ‘green infrastructure’. Furthermore, the Council has undertaken a comprehensive due diligence exercise where the Sites suitability for residential development was considered. The outcome of that exercise was that the site was suitable for residential development and the land was subsequently disposed of to a developer on that basis. 	<ul style="list-style-type: none"> • The land is identified in the latest Open Space Audit (2015) as POS of the natural/semi-natural green space typology, of which there is currently a deficit in the Ward where the site is located. The designations in the open space audit are based on the purpose and functions that the land performs regardless of ownership. • The Council is currently updating the Open Space Audit as part of a wider review of open space, sports pitches and built leisure facilities and will review this designation as part of this process and the Policies Map will be updated in a future review of the Plan if necessary. Existing open space, regardless of whether or not it is shown on the Policies Map is protected by Policy DC5, in accordance with paragraph 99 of the NPPF.
<ul style="list-style-type: none"> • A number of developers consider that the policy and policies map should be amended such that it is clear which areas of land are identified as open space (policy DC5) and which areas of land are designated as part of the Greenway Network or Strategic Green Links (policy DC3). • It is further considered that whilst there might be some spatial cross-over of land that is identified as protected open space (policy DC5) and land that is identified as either Strategic Green Links or part the Greenway Network (policy DC3), the justification for identification of protected land is different between policy DC3 and policy DC5 as the protection afforded is pursuant to different objectives. There is no justification for open space being afforded the blanket protection afforded by policy DC3; simply by virtue of land being identified as open space under policy DC5. 	<ul style="list-style-type: none"> • The Council considers that the Policies map correctly identifies all components of the Borough’s Green Infrastructure network with the respective policies ensuring appropriate protection.
<ul style="list-style-type: none"> • Whilst developers whose land is allocated within the Plan are generally supportive of the policy, there is a concern about any policy requirements that could threaten the viability and/or deliverability development. 	<ul style="list-style-type: none"> • Support noted. • The Council undertook the preparation of a full revised Local Plan Viability Assessment (2021) in support the Updated PSVLP 2021, which reviewed all infrastructure requirements and costs for each of the proposed allocations as well as assessing generic development typologies. Having undertaken this work the Council is confident that the necessary infrastructure is capable of being delivered.

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • In addition, Policy INF5 in the Updated PSVLP (2021) ensures sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought. • Following the conclusion of consultation on the Updated PSVLP, the Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington.
<ul style="list-style-type: none"> • A developer promoting land in east Warrington supports the identification of the Greater Manchester Wetlands Nature Improvement Area and it being referenced in this policy. 	<ul style="list-style-type: none"> • Support noted.
Statutory Consultees	
<ul style="list-style-type: none"> • St Helens Council supports the references in the policy to, and inclusion of, strategic green links connecting the Borough to the wider sub-region because many GI assets are cross boundary in nature. • In view of this, it is considered that it would be beneficial to include a specific reference to working in partnership with neighbouring Councils in section 1 of the policy. 	<ul style="list-style-type: none"> • Comment and support noted. • The Council considers that neighbouring Councils falls under the definition of 'other agencies and stakeholders' in Part 1 of the Policy, but is minded to consider making a specific reference to neighbouring Councils as a 'minor modification'.
<ul style="list-style-type: none"> • The Environment Agency support the references to biodiversity net gain (BNG). However, it is considered that a minimum percentage of 10% must be specified. 	<ul style="list-style-type: none"> • Support noted. • The Council does not consider there is a requirement to make specific reference to a minimum percentage of 10%. The Council will consider providing further detail on the operation of Biodiversity Net Gain through a future SPD.
Other	
<ul style="list-style-type: none"> • The Trans Pennine Trail Partnership welcome the inclusion of the reference to the TPT on Part 2 of the policy. 	<ul style="list-style-type: none"> • Support noted.

Policy DC3 - Green Infrastructure	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> The National Farmers Union consider that the policy must also recognise that this green infrastructure also represents some of the most productive agricultural land in the country and is critical to domestic food security. 	<ul style="list-style-type: none"> The Council has taken into account Agricultural Land quality in preparation of the Local Plan. Policy ENV8 includes a specific requirement for development proposals to demonstrate that any loss of the best and most versatile agricultural land in the Borough is minimised.
<ul style="list-style-type: none"> Cheshire Wildlife Trust support the principle of the policy subject to a number of detailed points and suggested amendments. These relate to ensuring consistency of the Policy with the Environment Act; strengthening the level of protection afforded in specific policy clauses; improving the clarity of the Policy; and expressing concern about the level of development proposed in the Plan that could impact on specific green infrastructure designations. 	<ul style="list-style-type: none"> The Council considers that the Policy as currently written is sound and has confirmed that it will give consideration to the preparation of an SPD to provide additional detail on the Council's approach to green infrastructure and Warrington's ecological network. The Council will consider the suggested detailed amendments to the Policy and may suggest 'minor modifications' to the text where these will improve clarity or are factual amendments.
<ul style="list-style-type: none"> The Warrington Climate Emergency Commission (WCEG) recommend that the policy should be amended to require the consideration of green infrastructure in urban areas including green walls etc. 	<ul style="list-style-type: none"> It is considered that the policy as worded will adequately protect green infrastructure in all locations. Part 1 of the policy protects existing green infrastructure generally, whilst Part 5 of the policy protects green infrastructure in respect of specific development proposals.
<ul style="list-style-type: none"> The CPRE is supportive of the local plan having a strategic approach to green infrastructure. However, the CPRE recommend inclusion of a specific reference to the value of hedgerows and the need for more retention and planting due to the nature based solutions to climate change and biodiversity collapse. 	<ul style="list-style-type: none"> The Council considers that the value of hedgerows will be considered in respect of the Plan's green infrastructure policies.
<ul style="list-style-type: none"> The Wild about Stockton Heath Group recommend that Parts 5 and 6 of Policy DC3 should be amended to acknowledge the green infrastructure value of some brownfield sites, and seek the protection of brownfield sites in Stockton Heath specifically, particularly in light of the biodiversity value that some brownfield sites have to offer. 	<ul style="list-style-type: none"> It is considered that the policy as worded will adequately protect green infrastructure in all locations. Part 1 of the policy protects existing green infrastructure generally, whilst Part 5 of the policy protects green infrastructure in respect of specific development proposals.

Policy DC4 - Ecological Network	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Local residents consider that the Policy is not sound as the policy does not meet the needs of the area; it does not provide enough protection for the environment; the Infrastructure budget shows a lack of commitment to green infrastructure; and the wording leaves the policy open to interpretation by developers. 	<ul style="list-style-type: none"> The Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on the environment (including climate change) through the Sustainability Appraisal process. In addition, an assessment of the potential effects on nearby European sites of nature conservation importance (Natura 2000 sites) has been considered through the Habitats Regulations Assessment (HRA) process. The Council has ensured that the allocation policies include specific provision to protect green infrastructure and provide mitigation and enhancements were necessary. New development will be required to be built to high design standards, include extensive areas of open space; meet biodiversity net gain targets and provide compensatory Green Belt improvements. In preparing the Plan, the Council has worked closely with statutory consultees including, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> Concern that the plan fails to reference the decision of the Council to call an Ecological Emergency across the Borough in 2020. Policy relates entirely to the protection of existing, recognised ecological sites. It does not provide clear guidance as to how biodiversity will be enhanced just how existing sites will be protected. There is no strategy to guide such enhancement, simply generic statements. The plan proposes to remove substantial areas of south Warrington from the Green Belt. These areas are predominantly undeveloped, green field sites. They represent environmental and ecological assets which are simply handed over for development, with no clear consideration as to how if they must be 	<ul style="list-style-type: none"> The Council has taken into account all relevant national legislation and policies in developing the Local Plan. It has given detailed consideration to the potential impacts of the Local Plan on the environment (including climate change) through the Sustainability Appraisal process. In addition, an assessment of the potential effects on nearby European sites of nature conservation importance (Natura 2000 sites) has been considered through the Habitats Regulations Assessment (HRA) process. The Council has ensured that the allocation policies include specific provision to protect green infrastructure and provide mitigation and enhancements were necessary. New development will be required to be built to high design standards, include extensive areas of open space;

Policy DC4 - Ecological Network	
Summary of Issues Raised	Response
<p>developed, they become exemplar models for the enhancement of biodiversity NPPF para 174.</p>	<p>meet biodiversity net gain targets and provide compensatory Green Belt improvements. In preparing the Plan, the Council has worked closely with statutory consultees including, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard.</p> <ul style="list-style-type: none"> • Policy DC4 seeks to protect priority species and habitats on development sites and achieve a measurable net gain in biodiversity in line with section 40 of the Natural Environment and Rural Communities Act and the NPPF (2021 update) which indicates that in delivering sustainable development local authorities should enhance as well as protect biodiversity and natural habitats. The proposed allocation policies (MD1 to MD6 and OS1 to OS6) make reference to the need for the developments to deliver an increase in biodiversity in accordance with the requirements in Policy DC4 to ensure that the Plan as a whole will achieve net gains in biodiversity.
<p>Landowner/Developer</p> <ul style="list-style-type: none"> • A number of developers consider that the policy will need to be redrafted in the context of the recent Environment Act 2021 and the July 2021 revisions to the NPPF at paragraph 7 further to resolution 42/187 of the United Nations General Assembly and Transforming our World: the 2030 Agenda for Sustainable Development. In particular, there is a need for a general bio-diversity net gain policy that will have to apply across the plan as a whole and to the site specific allocations. At present, the Local Plan is inconsistent in this regard. For instance, the Peel Hall site allocation policy MD4 Criteria 29 refers to measurable bio-diversity net gain but other site allocation policies don't. 	<ul style="list-style-type: none"> • It is acknowledged that there may need to be some minor factual amendments to the Policy and/or supporting text to take account of the Environment Act receiving Royal Assent, or minor amendments to provide for clarification in this regard. The Council will propose any changes as 'minor modifications' to the Inspector examining the plan. • The Council disagrees that there is a need for a general bio-diversity net gain policy. Policy DC3(4) indicates that the Council will work with partners to strengthen and expand the network of ecological sites, corridors and stepping stone habitats to, amongst other things secure a net gain in biodiversity. Whilst, Part 6 of the policy requires individual development proposals to secure a net gain in biodiversity. In addition ALL of the site allocation policies contain a requirement to secure a

Policy DC4 - Ecological Network	
Summary of Issues Raised	Response
	<p>measurable net gain in biodiversity (both the main allocation policies and the settlement policies)</p>
<ul style="list-style-type: none"> • A number of developers support Part 3 of the policy - which notes that development proposals that may affect European sites of International Importance will be subject to the most rigorous examination in accordance with the Habitats Directive – but consider that the policy requirements have not been satisfied in the context of Policy MD3 Fiddlers Ferry. 	<ul style="list-style-type: none"> • Support noted in respect of the overall policy approach. • The Council disagrees that the requirements have not been satisfied in the context of the Fiddlers Ferry allocation. All of the proposed allocation sites, including the Fiddlers Ferry site have been assessed in full accordance with the Habitat Regulations in the Updated HRA (2021) that accompanied the Updated PSVLP (2021).
<ul style="list-style-type: none"> • A number of developers support Part 5 of the Policy, but consider that as the entire southern parcel of the Fiddlers Ferry site allocation falls within a designated Local Wildlife Site (LWS) this policy cannot be satisfied. 	<ul style="list-style-type: none"> • The Council acknowledges that the southern part of the proposed allocation site falls entirely within the Upper Mersey Estuary LWS. However, the site allocation boundary covers a large area of land which is not proposed for development and the area that is proposed to be developed is previously developed land. It is considered that existing local wildlife site can be adequately protected and this detail can be worked through during preparation of the Development Framework which is a requirement of the allocation policy. • The site owners have produced a considerable amount of evidence to support their case for redevelopment of the power station site. This includes a vast amount of technical information as to how the lagoons to the south of the power station, including the ash deposits, can be utilised going forward. Despite the fact that the lagoons are man-made and were created for the purposes of cooling as part of the power station process, they have indeed developed their own ecological value. This has been considered within the site wide proposals, within which the lagoons will be retained, their ecological value enhanced and also be opened up for recreational use as appropriate.
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • Natural England recommend that the ecological networks and opportunity areas of the borough could be more clearly identified and 	<ul style="list-style-type: none"> • Comments noted. The Council will continue to work with Natural England and the Local Nature Partnership to ensure that the requirements of the Environment Act are met.

Policy DC4 - Ecological Network	
Summary of Issues Raised	Response
<p>mapped which going forward, can be advanced into more detailed Local Nature Recovery Strategy in line with the Environment Act.</p>	
<p>Other</p> <ul style="list-style-type: none"> Cheshire Wildlife Trust have set out a number of detailed concerns with the policy and have provided suggested amendments. These relate to ensuring consistency of the Policy with the Environment Act; providing a more detailed description of the Borough's ecological assets; strengthening the level of protection afforded in specific policy clauses; and improving the clarity of the Policy. In particular, the Trust considers that that the Council's approach to Biodiversity Net Gain should be strengthened, clarifying in the Policy that all development required to deliver a minimum 10% measurable net gain in biodiversity (either on site or if this is not achievable as off-site compensation). Ideally, the Council would express their ambition to deliver natures recovery by requiring all development to contribute to a substantially greater Biodiversity Net Gain (we recommend a minimum of 20%), regardless of where it is and the route by which it is permitted. This should include Nationally Significant Infrastructure Projects, Permitted Development and those development sites which initially have little measurable biodiversity value. Whilst the principle of net gain should be embedded in the Policy, the current policy wording is too detailed ahead of enabling regulations under the Environment Act and the detail should be addressed in a future SPD. 	<ul style="list-style-type: none"> The Council considers that the Policy as currently written is sound and has confirmed that it will give consideration to the preparation of an SPD to provide additional detail on the Council's approach to green infrastructure and Warrington's ecological network. This could include providing additional detail on the operation of Biodiversity Net Gain. The Council will consider the suggested detailed amendments to the Policy and may suggest 'minor modifications' to the text where these will improve clarity or are factual amendments.
<ul style="list-style-type: none"> The Warrington Climate Emergency Commission (WCEG) welcome the specific mention in the supporting text associated with Policy DC4 of the need to restore peat bogs wherever possible. However, there is a need to improve the capacity of these natural stores. The WCEG encourage the consideration of the degree to which the Local Plan can facilitate the increase of natural carbon storage, which in turn may support a net gain in biodiversity. It is suggested that there is a further mention of the 	<ul style="list-style-type: none"> It is considered that these points regarding the restoration of peat bogs and woodland and the protection of existing trees are already covered by Parts 4 and 5 of the policy. However, the Council acknowledges that some clarification in the supporting text would support the policy and is minded to propose this as a 'minor modification' to the Inspector examining the plan.

Policy DC4 - Ecological Network

Summary of Issues Raised

Response

general need to enhance soil health and woodlands wherever possible to improve natural carbon storage. Also, it is important to flag up the role of mature trees for carbon storage and the need to avoid their loss through development. Replanting trees in compensation sites may not deliver the same immediate CO2 removal benefits. It is recommended that the policy should aim to promote the incorporation of existing trees into scheme designs without the need for removal.

Policy DC5 - Open Space, Outdoor Sport and Recreation Provision	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The Proposals Map does not identify the land at the bottom of Doeford Close, Culcheth as protected public green space. It should be clearly marked as Public Open Space and protected for the local community. 	<ul style="list-style-type: none"> The land is not identified in the latest Open Space Audit (2015) as Public Open Space of any type. Whilst, the ownership of the land is uncertain it is acknowledged that it is used as informal amenity space and maintained by the Council. The Council will review this designation in a future update of the Open Space Audit and the Policies Map will be updated in a future review of the Plan if necessary. Existing open space, regardless of whether or not it is shown on the Policies Map is protected by Policy DC5, in accordance with paragraph 99 of the NPPF.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> Concern that the proposed development allocations in the Warrington Draft Local Plan and those in neighbouring St Helens around Winwick will lead to the loss of most of the green space in the area. 	<ul style="list-style-type: none"> In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that the development proposed will change the character of some areas of Warrington that have been allocated for development. The Council has, however, ensured that the allocation policies include specific provision to require new development to include new areas of publically accessible open space and provide compensatory Green Belt improvements.
Landowner/Developers	
<ul style="list-style-type: none"> The landowner promoting the Fiddlers Ferry allocation welcomes the opportunity for the Fiddlers Ferry masterplan to positively contribute towards policy requirements. This policy is in line with the NPPF Para 98. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> There is general support for the policy from developers and in particular for the use of an up to date evidence base to determine the requirement/provision of open space, sport and recreation provision. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> WBC's Playing Pitch Assessment (PPS) and assessment of indoor/non-pitch sports facilities are currently being finalised and a developer contributions methodology is yet to be finalised to establish appropriate levels of contributions. This affects points 5 and 6 of Policy DC5, which sets out the context for Playing Pitches and Indoor and Recreation 	<ul style="list-style-type: none"> The Council undertook the preparation of a full revised Local Plan Viability Assessment (2021) in support the Updated PSVLP 2021, which reviewed all infrastructure requirements and costs for each of the proposed allocations as well as assessing generic development

Policy DC5 - Open Space, Outdoor Sport and Recreation Provision	
Summary of Issues Raised	Response
<p>Facilities respectively. A policy requirement for playing pitches and indoor sport and green infrastructure could not be supported if this threatened the viability and/or deliverability of sites. A clause should be added to the policy to make clear that requirements will only be necessary where viable. The policy should further clarify how the requirement will be calculated, through reference to an SPD.</p>	<p>typologies. Having undertaken this work the Council is confident that the necessary infrastructure is capable of being delivered.</p> <ul style="list-style-type: none"> • In addition, Policy INF5 in the Updated PSVLP (2021) ensures sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought. • Following the conclusion of consultation on the Updated PSVLP, the Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington.
<ul style="list-style-type: none"> • The policy should not be applied to town centre sites. It fails to distinguish between suburban and town centre sites and the nature of the public open space such developments can provide and the impact on viability on town centre sites. In addition, the Council's own viability evidence indicates that residential development in the Town Centre is highly constrained and is unlikely to be able to support full financial contributions. Hence, it is not realistic to require residential development in the Town Centre to provide financial contributions towards the provision of sports pitches and indoor recreation. • The policy should be amended to acknowledge the unique circumstances associated with sites in the Town Centre and therefore should not apply the usual standards but state that the open space, sport and recreation provision for such developments should be discussed and agreed on a site by site basis. 	<ul style="list-style-type: none"> • Part 4 of Policy DC5 acknowledges that town centre sites may not be able to provide the full requirement of open space provision on site and that in such circumstances financial contributions towards off-site provision/enhancements to open space elsewhere in the town centre may be appropriate. • In addition, Policy INF5 in the Updated PSVLP (2021) ensures sufficient flexibility is included to allow for the viability of development proposals to be considered at the application stage where it can be clearly demonstrated, through a robust site-specific Financial Viability Assessment, that development would not be financially viable if full planning obligations were sought. • Following the conclusion of consultation on the Updated PSVLP, the Council has produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington.

Policy DC5 - Open Space, Outdoor Sport and Recreation Provision	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> The owner of land at Newcombe Avenue objects to their land being included within the Policy DC5 designation and considers that a wider extent of land extending up to the Padgate Brook should also be removed from the Policy DC5 designation. They consider that it is unclear which part of the policy relates to their site and how their site contributes to the policy aspiration of providing a comprehensive range of sport and recreation facilities across Warrington. The site is in private ownership and is not publicly accessible, nor is it safe for the public to access unsupervised. 	<ul style="list-style-type: none"> The land is identified in the latest Open Space Audit (2015) as POS of the natural/semi-natural green space typology, of which there is currently a deficit in the Ward where the site is located. The designations in the open space audit are based on the purpose and functions that the land performs regardless of ownership. Until recently (2019) the land was owned and maintained by the Council. The Council is currently updating the Open Space Audit and will review this designation as part of this process and the Policies Map will be updated in a future review of the Plan if necessary. Existing open space, regardless of whether or not it is shown on the Policies Map is protected by Policy DC5, in accordance with paragraph 99 of the NPPF.
<ul style="list-style-type: none"> The owners of land at Mill Lane are objecting to the open space designation on their land given they consider it is a suitable and sustainable site to come forward for housing. 	<ul style="list-style-type: none"> The land is identified in the latest Open Space Audit (2015) as POS of the natural/semi-natural green space typology, of which there is currently a deficit in the Ward where the site is located. The designations in the open space audit are based on the purpose and functions that the land performs regardless of ownership. The Council is currently updating the Open Space Audit and will review this designation as part of this process and the Policies Map will be updated in a future review of the Plan if necessary. The Council is aware that following publication of the Updated PSVLP, the site has as resolution to grant planning permission for residential development.
<ul style="list-style-type: none"> The cross-reference to policy DC3 should be removed. Policy DC5 is concerned with the provision of open spaces for the enjoyment of borough residents and its objectives are very different to Policy DC3, which has a much broader remit focussing on the environmental reasoning for identification of a Greenway Network and Strategic Green Links. It is not justified for criterion 2(a) of policy DC5 to state that new open space created will be afforded protection in accordance with policy DC3. Open space (existing or new) is not necessarily part of the 	<ul style="list-style-type: none"> Policy DC3 is an over-arching green infrastructure policy that encompasses all types of open space and its benefits. Many forms of open space, particularly informal open space, parks and gardens and natural/semi-natural open space are multi-functional and perform additional functions beyond just health and well-being of borough residents and opportunities for active travel. Paragraph 98 of the NPPF indicates that not only is access to a network of high quality open spaces and opportunities for sport and physical activity is important for the

Policy DC5 - Open Space, Outdoor Sport and Recreation Provision	
Summary of Issues Raised	Response
Greenway Network or Strategic Green Links to which policy DC3 relates, and there is no justification for all identified open space to be protected as if it were.	health and well-being of communities but that it can deliver wider benefits for nature and support efforts to address climate change. Therefore, it is considered entirely appropriate to cross reference to Policy DC3, which affords protection to all types of green infrastructure for the additional functions that it might perform.
<ul style="list-style-type: none"> Part 7b of the policy goes beyond the requirements of paragraph 97 of the Framework. These comments should be deleted from policy and the requirements of the NPPF paragraph 97 inserted. 	<ul style="list-style-type: none"> It is acknowledged that the wording of Part 7(b) of the policy goes beyond the requirements of the NPPF. In the Updated PSVLP 2021, Part 7(b) of the Policy was modified to refer to the exceptions listed in paragraph 99 of the NPPF (Revised 2021).
Statutory Consultees	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Other	
<ul style="list-style-type: none"> There is broad support for the policy from the CPRE and Cheshire Wildlife Trust, in particular the references to natural and semi natural greenspace and the standards for this set out in table 7. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> In relation to clause (4) of the policy CWT query why smaller developments (i.e. below the 40-dwelling threshold) would not be asked to contribute, potentially financially for off-site provision of open space. 	<ul style="list-style-type: none"> The threshold of 40 dwellings is appropriate having regard to the limited number of occupants that smaller developments would have and the limited size of on-site provision that would be justified to meet their needs. The supporting text was modified in the Updated PSVLP (2021) to clarify why there is a 40 dwelling threshold.
<ul style="list-style-type: none"> The CPRE suggest that consideration should be given to what is appropriate provision in the Green Belt. No buildings should be allowed in the Green Belt and the intrinsic value of openness should be maintained. 	<ul style="list-style-type: none"> The type of open space/sports provision that is appropriate in the Green Belt is addressed by national policy (paragraph 150 of the NPPF). Policy GB1 references national policy.

Policy DC6 - Quality of Place	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Policy not robust enough, does not look at cumulative effect of individual schemes on the area. 	<ul style="list-style-type: none"> • The intention of the policy is to ensure that good design practice is followed in-line with the NPPF's three over-arching objectives of the planning system 'well designed, beautiful and safe places, with accessible services and open spaces'. The NPPF also states that good design creates better places to live and helps make development acceptable to communities. • When considering planning applications there will be consideration of all necessary impacts on areas as advised by consultees including transport, community facilities and infrastructure requirements. Commutative impacts with other proposed schemes will be taken into account where relevant to do so. The requirements are set out in the relevant policies and land allocations of the plan which will be considered in conjunction with DC6 and relevant planning legislation.
<ul style="list-style-type: none"> • Nature of proposed housing estates does not enhance character. 	<ul style="list-style-type: none"> • The intention of the policy is to ensure that good design practice is followed in-line with the NPPF's three over-arching objectives of the planning system 'well designed, beautiful and safe places, with accessible services and open spaces'. These are considered key in delivering sustainable development and will be considered when proposals are put forward. • To further support the implementation of this policy and others in the plan, land allocation policies in the plan specify requirement of development with regard to their setting and in the case of larger allocations require Development Frameworks to support their implementation
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The designation of large scale development in South Warrington runs counter to the aspirations of this policy. Master plans are indicative of a failure to understand the context in which the developments would be delivered The Plan makes no clear provision for proposals to build on any inherent character and quality which already exists. 	<ul style="list-style-type: none"> • It is considered that Policy DC6, together with the criteria of the specific allocation policies, provide a clear basis on which more detailed development frameworks can come forward for the allocated sites, including those in south Warrington, or in respect of the preparation of

Policy DC6 - Quality of Place	
Summary of Issues Raised	Response
	<p>masterplans or design codes for other large or important sites across the Borough.</p> <ul style="list-style-type: none"> • The policy should be read in conjunction with paragraph 132 of the NPPF which states that ‘design quality should be considered throughout the evolution and assessment of individual proposals’.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • Support for policy and the need for good design 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • The reference to master plans and design codes should be deleted and incorporated into site allocations. It also does not make clear what threshold of development size a master plan will be required. 	<ul style="list-style-type: none"> • The policy should be read in conjunction with paragraph 132 of the NPPF which states that ‘design quality should be considered throughout the evolution and assessment of individual proposals’. • The policy indicates that these will be considered for larger sites and areas, particularly urban extensions. The requirement for the a master plan/development framework has been indicated in the land allocation policies, where necessary, and may be required on other sites as the result of pre-application discussions with the Council’s Development Management Team as sites come forward for planning permission.
<ul style="list-style-type: none"> • The explanatory text explains that the Council intends to produce and publish a framework for treatment of the public realm to ensure consistency throughout the borough. Richborough Estate reserve the right to comment on this document when this is published and. would not support a policy requirement that threatened the viability or deliverability of development. 	<ul style="list-style-type: none"> • The supporting text does not make reference to specifically producing a framework for the treatment of the public realm throughout the borough. It refers to the NPPF and paragraph 128 where design codes and design guides are encouraged. The Council may at some stage produce a design code or guide. It will as with all planning policy and guidance be consulted on in-line with the Council’s SCI (Statement of Community Involvement).
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • The National Grid request a policy amendment whereby it is proposed that ‘new development will take a comprehensive and co-ordinated approach to development including respecting existing site constraints to include utilities situated within sites.’ They believe the policy is not consistent with the NPPF 	<ul style="list-style-type: none"> • The policy is concerned with design principles that should be adhered to. Policy INF3 sets out the detailed requirements for developments with regard to development proposals in the vicinity of Utilities Infrastructure (points 5 to 8). Any development will need to meet these requirements.

Policy DC6 - Quality of Place	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Cheshire Constabulary supports the policy but feels that a fire safety point should be added at '1.1 For all relevant buildings and developments, consider and address fire safety matters as they relate to land use planning matters. Information provided should be proportionate to the scale, type and complexity of the proposal.' 	<ul style="list-style-type: none"> Support noted. The Council considers that the Policy as written is sound but recognises that the Inspector may want to address this point in recommending any main modifications to the Plan.
Other	
<ul style="list-style-type: none"> CPRE is broadly supportive as it campaigns for good design. Improved policy wording for landscape character protection and enhancement in the future is proposed as it should reflect the ever changing relationship between people, place and nature with references also to best practice and guidance. 	<ul style="list-style-type: none"> Support noted. The context of the policy is set out in the introduction to the policy (paragraphs 8.61 and 8.62) this specifically refers to the relationship of individuals and communities to their immediate and wider built and green environment. The supporting text refers to the NPFF design guidance which in turn refers to good practice guidance. The text also supports a 'Places Matter' design review where experts across a variety of land and building disciplines can advise on proposals and best practice therein.
<ul style="list-style-type: none"> The Trans Pennine Trail fully supports the inclusion of movement and accessibility in the policy 	<ul style="list-style-type: none"> Support noted
<ul style="list-style-type: none"> Stretton Neighbourhood Plan group feel that any housing that is proposed to be built within Stretton as part of any Garden Suburb should be required to strictly comply with this Policy, especially with respect to height. Housing should NOT be high rise and shall be limited to 2.5 storey high. The current three storey development at Henbury Gardens in Stretton is a classic example of what the community does not want to see again. The policy should ensure developers deal with matters of access, appearance, landscaping, layout, scale, ecology and environment. 	<ul style="list-style-type: none"> The allocation policy for the South East Warrington Urban Extension requires that a comprehensive development framework is produced for the area, which will include the area adjacent to Stretton. This will be subject to consultation with the local communities wherein views on design and layout can be put forward. Further to this any application will need to meet the specificities of the development framework. The allocation policy specifically mentions environment, access, landscaping, ecology and layout. Policy DC6 supports the allocation by requiring that the development meets specific design criteria.
<ul style="list-style-type: none"> Cheshire Wildlife Trust believe that biodiversity should be covered in its own bullet point as it can be delivered via other means such as in the design of buildings through green roofs, bat boxes etc. 	<ul style="list-style-type: none"> Other policies, including DC3 and DC5 deal with biodiversity as do individual allocation policies. The Town Centre SPD provide specific guidance on the use of SUDs, green walls and the adoption of other design approaches that support diversity. It is intend to revise current

Policy DC6 - Quality of Place	
Summary of Issues Raised	Response
	Design and Construction SPD to included measures to support biodiversity in building design and the Council has also confirmed that it will give consideration to the preparation of an SPD to provide additional detail on the Council's approach to green infrastructure and Warrington's ecological network.
<ul style="list-style-type: none"> • The Warrington Climate Emergency Commission (WCEC) welcomes part 4 of the policy but would like to see the local plan include specific examples of measures that could be introduced with reference to Reading Borough Local Plan. 	<ul style="list-style-type: none"> • The support is noted. The primary concern of DC6 is to set general design principles for development. It is acknowledged more detailed design measures to meet climate change would be a useful planning tool as the Council tackles the climate emergency, the Town Centre SPD already sets out guidance for town centre developments including the use of Green Walls, SUDs, greenspace and community gardens. It is intend to revise current Design and Construction SPD to included measures to tackle climate change and will ensure the Warrington Climate Emergency Commission is engaged in that process.

Objective W6 - To minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington's air quality	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The proposed developments proposed in the draft plan runs against the ability to reduce carbon output and does not meet with NPPF guidance. 	<ul style="list-style-type: none"> • The Council considers that the UPSVLP, along with its objectives and spatial strategy, provides an appropriate balance between economic, social and environmental objectives, in accordance with the requirements of the NPPF, with climate change being a key consideration.
<ul style="list-style-type: none"> • The impact on climate change by the loss of Green Belt is not reflected in the draft Plan. The SEUE is not sustainable. 	<ul style="list-style-type: none"> • Having reviewed Warrington's future development needs and exhausted all potential brownfield sites, the Council considers that the UPSVLP has sought to minimise the amount of Green Belt land being released and has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. • The UPSVLP closely reflects the Council's Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan's Spatial Strategy and that the Main Development Areas, including the South West Warrington Urban Extension, and other allocations in the Plan promote active transport and are well served by public transport. • The allocation policy for the South East Warrington Urban Extension in the UPSVLP includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes.

Objective W6 - To minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington's air quality	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • A local MP would like to see specific assessment of the impact on climate change and the mitigating measures proposed for climate change in the Local Plan. 	<ul style="list-style-type: none"> • The Local Plan in its allocation policies specifies the need for development to mitigate against the impacts of climate change and to meet a proportion of energy needs through renewable and low carbon sources. • In monitoring the Local Plan the Council will look to scrutinise planning applications on their low carbon energy proposals and potential impacts on the environment and amenity of areas. Specialist advice will be sort including that of the Warrington Climate Emergency Commission, the Environment Agency and specialist consultancies.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • W6 is supported. 	<ul style="list-style-type: none"> • Support noted
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • The declaration by WBC of a climate emergency and the pledges to make the Borough a net zero area, align with the Warrington and Halton Trust's ambitions, with the Trust being a key delivery partner against these objectives of the Local Plan. 	<ul style="list-style-type: none"> • Support and comments noted.
<i>Others</i>	
<ul style="list-style-type: none"> • The CPRE supports the objective. 	<ul style="list-style-type: none"> • Support noted

Policy ENV1 - Waste Management	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • Given the industrial legacy of the Fiddlers Ferry site, the owner of the site welcomes the aftercare provisions of Policy ENV1 and the emphasis within the policy on beneficial afteruse. The Fiddlers Ferry Masterplan delivers on this requirement and will be fully aligned to NPPW Para 8 and the provisions of Policy ENV6. 	<ul style="list-style-type: none"> • Support and comments noted.
<ul style="list-style-type: none"> • Developers included in the previous Garden Suburb allocation from the PSVLP 2019 support the provision of new waste facilities on industrial estates and in employment areas. However, it is noted that a Community Recycling Centre is required as part of Policy MD2 (SEWUE) but there is no indication as to where this should be and no employment areas are proposed in the revised allocation. 	<ul style="list-style-type: none"> • Policy ENV1 does not restrict waste facilities to just industrial estates or employment areas. The allocation policy MD2 requires the production of a Development Framework that requires a comprehensive masterplan based on the principles set out in the policy, including the requirement for a Community Recycling Centre.
Statutory Consultees	
<ul style="list-style-type: none"> • St Helens Council have advised that the Merseyside & Halton Joint Waste Local Plan 2013 was prepared by the 5 Merseyside local authorities and Halton Council. It will be necessary for the needs assessment underpinning Policy ENV1 to adequately dovetail with the monitoring of the Joint Waste Local Plan. On-going liaison should take place to ensure any cross boundary waste issues affecting St Helens are adequately addressed in this policy. 	<ul style="list-style-type: none"> • The Council is committed to working with St Helens on these matters through the Duty to Cooperate.
<ul style="list-style-type: none"> • While Cheshire West & Chester currently has sufficient landfill capacity, this is dependent on permitted landfill sites coming forward. Therefore, CW&C supports paragraph 9.1.14 and Warrington's commitment to work in partnership with its neighbours in the region through the North West Waste Network, of which CW&C are also members. 	<ul style="list-style-type: none"> • Support noted.
Other	

Policy ENV1 - Waste Management	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • CPRE supports the sustainable use of a waste hierarchy to reduce, reuse and recycle to minimise waste. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • The CPRE and Cheshire Wildlife Trust consider that clause 6 of this policy should be strengthened. Clause(6) should make it clear that proposals involving landfill or land raising will be required to include a restoration and aftercare scheme, rather than that they will be permitted if such a scheme is submitted; that rural land should be returned to the same or better condition and that it is not regarded as previously developed land. 	<ul style="list-style-type: none"> • The Council is confident that the Policy as currently worded is sufficiently robust with regard to restoration and aftercare.
<ul style="list-style-type: none"> • Stretton NDP Group consider that the replacement Sandy Lane Recycling Centre to serve the South of Warrington must not be located within Stretton village or any part of the Garden Suburb that is removed from the Green Belt. Ideally it should be within the existing Barleycastle Trading Estate. 	<ul style="list-style-type: none"> • It is the Council's intention that a replacement of the existing Community Recycling Centre (CRC) in Stockton Heath should be provided in the proposed South East Warrington Urban Extension (SEWUE) allocation. The allocation policy MD2 requires the production of a Development Framework which will identify the location of the new facility. The Development Framework will be subject to public consultation. • Policy ENV1 specifies suitable locations for new waste management facilities. Any new facility would need to comply with these requirements and other relevant policies in the Plan. This will ensure that the amenity of existing and future residents is protected.

Policy ENV2 - Flood Risk and Water Management	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None 	
Landowner/Developer	
<ul style="list-style-type: none"> • The owners of the Fiddler Ferry site support the policy. They state the Fiddlers Ferry Regeneration proposals have been fully assessed within the Local Plan's Strategic Flood Risk Assessment (SFRA) and SSE fully supports ENV2 with its strong alignment with the NPPF and the accompanying 'Planning Guidance on Flood Risk and Coastal Change'. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Developers opposing the allocation of the Fiddlers Ferry site express concern in respect of how the southern parcel of the Fiddlers Ferry allocation can be justified given flood risk and the presence of the fly ash lagoons. 	<ul style="list-style-type: none"> • The site owners have produced a considerable amount of evidence to support their case for redevelopment of the power station site. This includes a vast amount of technical information as to how the lagoons to the south of the power station, including the ash deposits, can be utilised going forward. That part of the site to the south of the railway line which is proposed for residential use is significantly higher than the River Mersey and is not at any risk of flooding. Despite the fact that the lagoons are man-made and were created for the purposes of cooling as part of the power station process, they have indeed developed their own ecological value. This has been considered within the site wide proposals, within which the lagoons will be retained, their ecological value enhanced and also be opened up for recreational use as appropriate.
<ul style="list-style-type: none"> • Unnecessary level of repetition in the policy. 	<ul style="list-style-type: none"> • The policy has been worded following consultation with the Environment Agency and United Utilities and is considered suitable to meet the needs of flood risk and water management.
<ul style="list-style-type: none"> • The Environment Agency has recently made substantial amendments to the online Flood Map but there remains a number of inconsistencies and it is essential that the Council works closely with the EA to ensure that 	<ul style="list-style-type: none"> • The Council has updated its relevant assessments to take into account the amendments made to the Environment Agency's Flood Risk mapping.

Policy ENV2 - Flood Risk and Water Management	
Summary of Issues Raised	Response
site allocations and decision making are based upon accurate and up to date information.	
Statutory Consultees	
<ul style="list-style-type: none"> • Environment Agency: strongly support this policy 	<ul style="list-style-type: none"> • Support noted.
Other	
<ul style="list-style-type: none"> • The Stretton Neighbourhood Plan group state that local ponds should be retained and incorporated within development. Retention of these is to maintain the local waterway surface run off facilities and storm water attenuation, continue to provide habitat for local wildlife and to preserve the character of the local countryside and environment. 	<ul style="list-style-type: none"> • Comments noted and where possible this will be the case in accordance with the requirements of the Policy.
<ul style="list-style-type: none"> • CWT supports this policy, including its emphasis on use of sustainable drainage systems (SuDS) and “slowing the flow”. However, CWT do not support any development in undefended areas of the floodplain. Floodplains can support protected and priority habitats and species, and also support habitats that both store and sequester significant volumes of carbon. It is also considered that the policy could spell out more clearly that the “multi-functional benefits” of SuDS systems (in clause 13) include biodiversity enhancements and provide greater clarity in respect of discharge solutions from green field sites (Clause 12a). 	<ul style="list-style-type: none"> • Support noted. • All planning applications on sites in the flood plain will need to provide a Flood Risk Assessment and details on flood alleviation and will be subject to consultation with the Environment Agency. • The Council considers that this Policy, together with the Plan’s green infrastructure policies provide sufficient detail in respect of biodiversity. • The Council considers the policy wording in respect discharge solutions for green field sites is sufficiently clear.
<ul style="list-style-type: none"> • The NFU comment that there has been a considerable amount of development in Warrington recently at a time when more extreme rainfall events are becoming more common. These developments lead to a reduction in the water carrying capacity of the green spaces and increase the rate of water runoff from these developments into the farmland drainage system. As a result, even more pressure is being placed on the system which is meaning that urban water is finding its way into farmers’ fields and causing crop losses. Therefore a condition should be placed on the developers to make sure that any development does not increase the flood risk of neighbouring farm land. 	<ul style="list-style-type: none"> • The policy requires requiring specific mitigations measure for flooding for all developments to be put in place. In addition all policy allocation require a surface water strategy to improve greenfield run off and that surface water be integrated into a site’s green infrastructure requirements.

Policy ENV2 - Flood Risk and Water Management	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • CPRE agrees that new development should not result in increased flood risk from any source, or cause other drainage problems, either on the development site or elsewhere. 	<ul style="list-style-type: none"> • Support noted

Policy ENV3 - Safeguarding of Mineral Resources	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • General support for policy and principle of safeguarding mineral resources, with some developers giving specific support to Part 3 of the policy which they consider is sufficiently flexible with regard to mineral extraction and development 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • A number of developers consider that the Mineral Safeguarding designation should not be applied to proposed allocation sites or to land within the existing urban area (particularly the town centre) because; it is misleading; will create uncertainty over their delivery within the plan period and as such renders the policy unsound; and the reality is that mineral extraction works in town centre locations is unrealistic given the implications for traffic, air quality, noise, dust and vibration making long term extraction in these locations a challenging proposition. 	<ul style="list-style-type: none"> • Part 3(f) of Policy ENV3 refers to the list of non-mineral development exempt from the requirements of safeguarding in Table 8 (page 143). This makes clear that development within the urban area is excluded from the requirements to consider the MSA on sites of less than 5ha. This is consistent with the advice in paragraph: 004 (Reference ID: 27-004-20140306) of the planning practice guidance which indicates that it can be appropriate to safeguard mineral resources in designated areas and urban areas, as safeguarding of minerals beneath large regeneration projects in brownfield land areas can enable suitable use of the mineral and the stabilisation of any potentially unstable land before any non-minerals development takes place. The supporting text (paragraphs 9.3.14 to 9.3.16) explains that it is recognised that much of the resource has already been built on and sterilised and that identifying the full extent of resources available and requiring prior extraction may place onerous requirements on developers and therefore, the policy only requires those proposed developments on sites of greater than 5ha within the urban area to undertake a mineral resource assessment.
<ul style="list-style-type: none"> • The policy should be revised to state that where the benefits of development outweigh the benefits of extracting a mineral resource, priority will be given to the beneficial development. 	<ul style="list-style-type: none"> • Part 3(e) of the policy already allows for this prioritisation.
Statutory Consultees	

Policy ENV3 - Safeguarding of Mineral Resources	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • MPA - Figure 14 appears to include some element of mineral safeguarding for Sandstone and Clay at Southworth Quarry and Clay Pits. We seek clarification as to whether or not the Council is or isn't proposing to safeguard clay and sandstone resources. If the latter, we must maintain an objection as this approach does not accord with the NPPF and would render the plan unsound. 	<ul style="list-style-type: none"> • The Council considers the Figure is clear and it can confirm that it is proposing to safeguard clay and sandstone resources.
<ul style="list-style-type: none"> • MPA - It is unclear if the boundaries shown on Figure 14 represent mineral safeguarding areas or the buffer zones referred to in Table 9. Whilst the MPA support the buffer zones, it is not clear if these represent the extent of the resource, or a zone simply drawn around the quarry. We reaffirm our need to ensure sandstone and clay resources. 	<ul style="list-style-type: none"> • Paragraph 9.3.17 of the Updated PSVLP confirms that the boundaries include the buffer zones.
<ul style="list-style-type: none"> • The Mineral Planning Association again question if the Council has considered identifying Areas of Search in order to address the recognised shortfall, given no new sites for Mineral extraction have been identified. 	<ul style="list-style-type: none"> • The Council commissioned a Mineral Resource Study as part of the evidence base for the emerging Local Plan. As part of this study a call for sites exercise was undertaken with the minerals industry, however, no sites were nominated for consideration as part of the Local Plan review. Hence, the consultants reviewed the potential sites/areas identified within the previous MRS from 2009 and contacting those operators and landowners who had nominated sites previously to establish whether they wished the sites to be considered within the Local Plan review. Only one landowner responded requesting their site be considered as part of this latest review. This site was assessed and found to be unsuitable for designation as a AoS due to; the lack of information regarding the level of mineral resource available; a number of non-statutory designation within and surrounding the proposed AoS; the presence of a Major Accident Hazard Pipeline on part of the site, all of which would impact on the potential of the site to be used for mineral extraction.

Policy ENV3 - Safeguarding of Mineral Resources	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • An existing business requests that exemption (e) is removed from proposed Policy ENV3 (Part 5). Paragraph 210 (e) of the NPPF requires planning policies to safeguard facilities for transporting, handling and processing minerals. The operation of the roadstone coating plant and all other minerals infrastructure sites within the borough, should be appropriately safeguarded thorough the emerging Local Plan period. This is to ensure that the proposed strategic policy meets the ‘soundness’ tests as set out in paragraph 35 (d) of the NPPF. • The business also suggests that the policy title is amended to read ‘Safeguarding of Minerals Resources and Infrastructure’ given that the policy covers both mineral resources and infrastructure. 	<ul style="list-style-type: none"> • The policy provides adequate protection for infrastructure/facilities for transporting, handling and processing minerals as it is drafted. Criteria (e) does not undermine the protection provided by the policy. • The Council does not consider that the title of the policy needs to be amended.

Policy ENV4 - Primary Extraction of Minerals	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England support the proposed policy as it ensures that mineral extraction proposals will be required to be in accordance with other policies in the Local Plan, which includes the historic environment policy (DC2) and also because it supports the provision of building stone quarries for the extraction of materials for use in the conservation and restoration of heritage assets and to sustain local vernacular. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Cheshire West and Chester are concerned that the landbank in the sub-region is now only 4.4 years, based on 10-year average sales and that no new sites have been identified in Warrington. This could lead to a future deficit and potential need for additional sand and gravel from other areas, including CW&C. Going forward, CW&C suggest that to be effective, this is managed through the North West Aggregate Working Party. 	<ul style="list-style-type: none"> • Comments noted. • The Council will continue to work with the neighbouring authorities of Cheshire East and Cheshire West & Chester to ensure that Warrington’s unmet needs, as part of the aggregate shortage in the wider AGMA/Merseyside sub-region, do not place an individual burden on the two authorities and the wider Cheshire sub-region.
Other (1):	
<ul style="list-style-type: none"> • The Mineral Products Association (MPA) question the use of the word 'departure' in Part 2(a) of the policy. A proposal for mineral extraction outside of a mineral safeguarding area is not considered a “departure” in land use planning terms. It is suggested amending the wording to read “The developer can provide evidence to support the need for extraction.”. • The MPA consider that the wording in paragraph 9.4.5 of the supporting text does not truly represent the wording of the PPG, which requires that LAAs must also include a forecast of the demand for aggregates. It is 	<ul style="list-style-type: none"> • The Council considers the existing wording of the Policy is robust and consistent with relevant Government planning policy and guidance.

Policy ENV4 - Primary Extraction of Minerals	
Summary of Issues Raised	Response
<p>recommended that this paragraph is reworded to reflect the PPG as follows: “The NPPF introduced a requirement for MPAs to <u>forecast the demand for aggregates through the preparation of an annual Local Aggregates Assessment (LAA).....”</u></p> <ul style="list-style-type: none"> • The MPA consider that the wording in paragraph 9.4.6 of the supporting text does not truly represent the wording of the NPPF which requires at least 25 years of brick clay reserves. It is recommended that this paragraph is reworded to reflect more accurately reflect the NPPF as follows: “National policy requires that a stock of permitted reserves of <u>at least 25 years be provided</u>”. 	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust is broadly content with policy ENV4 provided effective restoration and aftercare of sites is required (see comments policy ENV6). 	<ul style="list-style-type: none"> • Support noted.

Policy ENV5 - Energy Minerals	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> The exploitation of fossil fuels is environmentally unacceptable under the context of a climate emergency. The policies within the Plan are far too permissive, when taking UK legal targets and the Paris Agreement into account. We face an immense task of combatting the damage that has already been inflicted through combustion of fossil fuels and therefore it is not acceptable to be permitting further damage to be done. It is contradictory both to the climate ambitions of the Council and to the other policies within the Plan (e.g. Policy ENV7) to allow the extraction of fossil fuels within the Borough. It is suggested that there should be far more rigorous control to limit this from taking place and that the policies for hydrocarbons are treated in a similar manner to peat extraction. 	<ul style="list-style-type: none"> Unlike with peat extraction national policy for some fossil fuels is framed positively. Paragraph 215(a) of the NPPF requires that mineral planning authorities should plan positively for the three phases of on-shore oil and gas development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided. Policy ENV5 is considered to be consistent with this requirement.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> Developers promoting land previously included in the Garden Suburb allocation from the PSVLP 2019 support Part 7 of the policy relating to Peat Resources and consider that these should be clearly marked on the Policies Map. Presence of peat further demonstrates the limited opportunities for Warrington to grow outwards and why development in South East Warrington is critical. 	<ul style="list-style-type: none"> Support and comment noted.
<ul style="list-style-type: none"> A developer promoting land in east Warrington considers that Figure 16 does not provide an up to date or accurate portrayal of the distribution of peat within the Borough particularly to the east of the M6 corridor. Much of the peat in this area was removed during the Second World War to be used as fuel. Figure 16 should be revised to more closely reflect the distribution of peat east of the M6. 	<ul style="list-style-type: none"> The Council's most up to date records indicate the presence of Peat in this location. The Council and its ecological consultants have reviewed information submitted by the developer promoting land in this location, but this has not demonstrated an absence of Peat. Further, Natural England have confirmed that they been working with partners to develop restoration methods which effectively restore even the most damaged and dry peat so it is able to hold water and sequester carbon if it remains in-situ and undeveloped.
Statutory Consultees	

Policy ENV5 - Energy Minerals	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Historic England supports the proposed policy as it ensures that energy mineral developments will be required to be in accordance with other policies in the Local Plan which includes the historic environment one. In view of this, we consider that this policy meets the NPPF requirements for the historic environment. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Natural England recognise and support the protection afforded to the peat resource in Warrington. However, they are concerned that there is no policy protection in the Plan from development on peat. Development on peat may cause irreversible damage, it will prevent wetland habitat/bog restoration that is vital for resilient ecological networks and will have significant carbon emission implications. 	<ul style="list-style-type: none"> • Paragraphs 210(a) and 211(d) of the NPPF indicate that LPA's should not identify or grant planning permission for new sites or extensions to existing sites for peat extraction. This policy is concerned with exploitation of energy minerals, there are other policies in the Plan to that seek to protect biodiversity and address the impacts of climate change, in particular Part 5 of Policy DC3.
Other	
<ul style="list-style-type: none"> • While UKOOG support the requirements of 2(a) and 2(b), we would like to remind the local authority that the majority of the environmental considerations associated with onshore oil and gas development are within the remit of the Environment Agency. The inspector's decision in the Wressle appeal also stated, 'In line with the NPPG on Minerals I am entitled to assume that other regulatory regimes will operate effectively and that it is not necessary for me to carry out my own assessment because I can rely on the assessment of the other regulatory bodies. 	<ul style="list-style-type: none"> • Comments noted
<ul style="list-style-type: none"> • Although the proposed policy on hydrocarbon development (set out in clause 3) broadly accords with current government policy, Cheshire Wildlife Trust and the CPRE have concerns about the potential impact of this form of development and object to the exploration of hydrocarbons as all fossil fuel must remain in the ground to fulfil the nation's international commitments on Climate Change. 	<ul style="list-style-type: none"> • Comments noted.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust suggest that clause (3) be phrased in the negative ("... will only be approved provided that..."). It is also suggested that clause 3(c) should be changed to require landscape and visual impacts to be found acceptable rather than just to be assessed. 	<ul style="list-style-type: none"> • The Council considers the policy is already sufficiently robust in this regard.

Policy ENV5 - Energy Minerals	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Cheshire Wildlife Trust and CPRE strongly supports the protection for the Borough's peat resources which is provided for in clause (7) of this Policy. • Cheshire Wildlife Trust and CPRE would like to see clause (7) expanded to also cover peat extracted to facilitate the extraction of other minerals and also peat extracted to facilitate development. A source should be referenced for the peat resources displayed on Fig 16. 	<ul style="list-style-type: none"> • Support noted. • The Paragraphs 210(a) and 211(d) of the NPPF indicate that LPA's should not identify or grant planning permission for new sites or extensions to existing sites for peat extraction. This policy is concerned with exploitation of energy minerals, there are other policies in the Plan to that seek to protect biodiversity and address the impacts of climate change, in particular Part 5 of Policy DC3.
<ul style="list-style-type: none"> • The Warrington Climate Emergency Commission (WCEG) consider that the extraction of hydrocarbons for energy is environmentally unacceptable. The policies are too permissive in relation to the Paris Climate Agreement and UK targets for carbon emission reductions. It is suggested a more rigorous approach is taken and that hydrocarbon extraction is treated the same as peat extraction. 	<ul style="list-style-type: none"> • The NPPF (paragraph 215(a)) indicates that mineral planning authorities should plan positively for the three phases of on-shore oil and gas development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided.

Policy ENV6 - Restoration and Aftercare of Mineral and Waste Sites	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • The landowner of the Fiddlers Ferry allocation site supports Policy ENV6 with its focus on enhanced biodiversity and geodiversity in restoration projects of former waste and mineral sites and the alignment of the policy to paragraph 146 of the NPPF. The Fiddlers Ferry Regeneration Vision aligns fully with this and will ultimately allocate over 50% of the site to new parkland use. 	<ul style="list-style-type: none"> • Support and comments noted.
Statutory Consultees	
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • United Kingdom Onshore Oil & Gas (UKOOG) supports the Policy and criterion providing they only apply to planning matters and do not overlap or interfere with the responsibility of other regulators. 	<ul style="list-style-type: none"> • Support and comment noted.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust considers that Part 1 of the policy could be strengthened and that whilst paragraphs 9.6.6. and 9.6.7 are supported, as they recognise the scope which often exists for mineral and waste sites to be restored to enhance biodiversity, it is felt that this should be more clearly set out in the policy itself. 	<ul style="list-style-type: none"> • The Council considers the Policy is sufficiently robust and no revisions are required in this regard.
<ul style="list-style-type: none"> • CPRE considers that the policy is deficient in ensuring land in rural areas would be left in an improved condition and not considered as previously developed. 	<ul style="list-style-type: none"> • The Council considers that the policy is robust in ensuring that land in rural areas is appropriately restored.
<ul style="list-style-type: none"> • The Mineral Product Association consider that the wording in paragraph 9.6.6 of the supporting text should be amended as other forms of development may be appropriate on former mineral sites, and this may include built development. It should be made clear that the list provided is not exclusive. 	<ul style="list-style-type: none"> • The wording is similar to an consistent with that used in the Planning Practice Guidance (Paragraph: 045 Reference ID: 27-045-20140306) and does not preclude other forms of development.

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> Policy ENV7 could be strengthened to take greater consideration of upcoming building standards. The Future Homes Standard is to be enforced from 2025 and upcoming changes to the Part L Building Regulations will take effect in 2023. The Future Homes Standard sets out that new buildings should be zero-carbon ready and will not be built with fossil fuel heating. 10% minimum standard for renewable/low carbon sources for new developments is limited. Warrington should be implementing policies that go above and beyond current minimum requirements for carbon reductions and seek to build new developments that are as close to zero-carbon as possible. 	<ul style="list-style-type: none"> The Council considers that the policy provides an appropriate level of support for renewable and low carbon development within the context of current national planning policy. The Council will consider providing clarification in the supporting text to reference the progressive change to the Building Regulations and the Future Homes Standards as a 'minor modification' to be proposed to the Inspector examining the plan. The Council is committed to provide additional planning guidance in respect of promoting energy efficiency and low carbon technologies in updating its current Design and Construction Supplementary Planning Document (SPD) and in future reviews of the Local Plan.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none">
Landowner/Developer	
<ul style="list-style-type: none"> Some developers have provided support for the general intent of the policy in seeking to support renewable and low carbon energy infrastructure, with one developer suggesting this could be strengthened to include a specific reference to support net carbon zero development. 	<ul style="list-style-type: none"> Support noted. The Council consider that the policy provides an appropriate level of support for renewable and low carbon development within the context of current national planning policy.
<ul style="list-style-type: none"> The owner of the Fiddlers Ferry site allocation welcomes the Council's policy and approach to renewable and low carbon energy development within the Borough. The Fiddlers Ferry masterplan has the potential to utilise part of its employment area for innovative low carbon projects which can avail of the site's proximity to national grid connectivity. Policy ENV7 provides a positive policy context should an opportunity arise in this regard. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> A large number of developers consider that the requirements to meet at least 10% of energy needs from renewable / low carbon sources or to reduce carbon emissions by at least 10% go against the Government's intention that achieving net zero carbon development should be set 	<ul style="list-style-type: none"> The Council consider that the policy provides an appropriate level of support for renewable and low carbon development within the context of current national planning policy.

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
<p>through the Building Regulations, in particular the forthcoming Part L and the Future Homes Standards. As such, there is objection to the Council seeking reductions to carbon emissions beyond Building Regulation requirements. There is also concern that the targets are arbitrary and unjustified.</p>	
<ul style="list-style-type: none"> • A number of developers object to the requirements in Part 5 of the Policy, that requires site allocations to maximise opportunities for the use of decentralised energy systems. Such an approach is considered inflexible given that such systems are only likely to be feasible for the largest allocations and other technologies may be more efficient and effective. 	<ul style="list-style-type: none"> • Paragraph 155 of the NPPF requires Local Plans to seek to increase the use and supply of renewable and low carbon energy and heat, by providing a positive strategy for energy from these sources and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. Policy ENV7 is consistent with these requirements. It only requires the strategic housing allocations to establish or connect to a decentralised energy network if it is <u>feasible and viable</u> to do so. • There is flexibility in the policy in that it allows for a target to be met for either energy produced from renewable sources OR a reduction in carbon emissions.
<ul style="list-style-type: none"> • There are objections from a number of developers to applying a blanket requirement to all major development to minimise carbon emissions. It is considered to be unjustified as the Deregulation Act (2015) included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than building regulation energy efficiency standards for new homes. It is considered that Part 4 and 5b of the Policy should be removed. 	<ul style="list-style-type: none"> • Whilst, the requirement in Part 4 of the policy still applies to all major developments, it allows schemes the option of using renewable and/or low carbon energy sources to provide a proportion of their energy needs or reducing their carbon emission rates by improved energy efficiency measures in the building fabric. • Furthermore, the amendments to the Planning and Energy Act 2008 have not yet been brought into force as the Deregulation Bill 2015 has still not received Royal Assent.
<ul style="list-style-type: none"> • A number of developers have expressed concern that the cost of providing infrastructure required by the Policy, as well as the new Part L Building Regulation standards (due to come into force in June 2022) and Future Homes Standards (due to come into force in 2025) have not been factored into the Local Plan Viability Assessment and the implications of the Policy cannot therefore be properly assessed. 	<ul style="list-style-type: none"> • The Council has make specific provision for the requirements of Policy ENV7 in its Local Plan Viability Assessment. Further detail is provided in the Local Plan Viability Assessment Addendum 2022.

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England supports the proposed policy as it ensures that renewal and low carbon energy developments will be required to be in accordance with other policies in the Local Plan, which includes the historic environment one. In view of this, it is considered that the policy meets the NPPF requirements for the historic environment. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Manchester Airport Group welcome the requirement that is set out at paragraph 9.7.12 for wind energy proposals to demonstrate accordance with policy INF6. 	<ul style="list-style-type: none"> • Support noted.
Other	
<ul style="list-style-type: none"> • Stretton NDP Group considers that all community buildings (however small) and large logistics distribution centres should be constructed to accommodate solar power and/or hot water installations so that they can contribute to renewable and low carbon efficiency. 	<ul style="list-style-type: none"> • It would be unduly restrictive to require these specific types of development to utilise solar power and/or hot water infrastructure as a means of reducing carbon emissions. For example, most large warehousing uses do not have a demand for large amounts of heating/hot water and not all have large power requirements either. In many cases the requirement is for cooling rather than heating/hot water or power. Hence, the Council's policy is designed to give developments the flexibility to minimise carbon emission by the most appropriate method dependent upon the end user requirements.
<ul style="list-style-type: none"> • The Home Builders Federation object to the Council setting local energy efficiency standards to achieve the shared net zero goal. The HBF considers that the Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. There is also a concern that a specific requirement for decentralised heat networks is too prescriptive and alternative low carbon technologies may be more efficient and effective. 	<ul style="list-style-type: none"> • The Council consider that the policy provides an appropriate level of support for renewable and low carbon development within the context of current national planning policy. • Paragraph 155 of the NPPF requires Local Plans to seek to increase the use and supply of renewable and low carbon energy and heat, by providing a positive strategy for energy from these sources and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. Policy ENV7 is consistent with these requirements. It only requires the strategic housing allocations to establish or connect to a decentralised energy network if it is <u>feasible and viable</u> to do so.

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Cheshire Wildlife Trust supports the need to decarbonise energy production in an appropriate way and that the policy recognises that environmental impacts must be addressed in line with other Plan policies. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> CPRE is broadly supportive of the policy, although they state that the siting of renewable energy development should not harm rural landscapes that are otherwise unbuilt and that electric vehicle infrastructure should be supported by the Local Plan. 	<ul style="list-style-type: none"> Support noted. The policy requires other relevant Plan policies to be taken into account. Policies DC1 and DC6 seek to protect the countryside outside of existing settlements, including local character, distinctiveness and wider landscape setting. Policy INF1 requires development to provide infrastructure for the charging of plug-in and ultra-low emission vehicles.
<ul style="list-style-type: none"> Warrington Climate Emergency Commission (WCEC) supports the sentiment in the policy in respect of reduction of carbon emissions, promotion of renewable energy and promoting the opportunity for district heat networks. However it is considered that the policy should be strengthened to include sufficient acknowledgement of the Future Homes Standard and Part L Building Regulations at the very beginning of the plan period to avoid expensive retrofitting. It is considered that the 10% requirement is not sufficiently ambitious compared to other authorities and is out of step with the direction of travel to net zero. It is therefore suggested that developers for all new major developments are required to submit a carbon statement, outlining the total emissions of the proposal and the measures in place to be compatible with net zero. Developers should be expected to detail how they have taken net-zero targets into account and quantify the carbon footprint of proposals, rather than just satisfying a minimum standard. Similarly, developers should disclose how their plans will meet Future Homes Standards to be 'zero-carbon ready' without need for future retrofitting. 	<ul style="list-style-type: none"> The Council considers that the policy provides an appropriate level of support for renewable and low carbon development within the context of current national planning policy. The Council will consider providing clarification in the supporting text to reference the progressive change to the Building Regulations and the future Homes Standards as a 'minor modification' to be proposed to the Inspector examining the plan. The Council is committed to working with the WCEC to provide additional planning guidance in respect of promoting energy efficiency and low carbon technologies in updating its current Design and Construction Supplementary Planning Document (SPD) and in future reviews of the Local Plan.

Policy ENV7 - Renewable and Local Carbon Energy Development	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The Commission is also concerned that there is a lack of current data in Section 9.7 of the Plan relating to Warrington’s emissions and recommend adopting the Tyndall Centre’s Local Authority Carbon Budget report tool which outlines Warrington must meet reductions in CO2 emissions on the scale of 13.7% per year. This would provide current policies with greater justification and any additions or changes can be made in line with these figures. 	
<ul style="list-style-type: none"> • The National Farmers Union - Farmers and land managers are uniquely placed to help provide solutions to climate change. This includes undertaking activities such as tree planting which will sequester carbon but also to provide renewable energy through wind, solar power and anaerobic digestion. Planning policy should look to facilitate on farm renewable energy projects and not act as a barrier to them. 	<ul style="list-style-type: none"> • Part 1 of Policy ENV7 supports proposals for infrastructure that would produce, store and/or distribute low carbon or renewable energy and indicates that consideration will be given to any environmental, social and/or economic benefits that schemes would provide. It is considered that the policy wording as drafted has sufficient flexibility to support farm renewable energy projects, subject to complying with other policies in the Plan.

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • The Council's aims regarding air pollution are sound, although contradicted by policies proposed. The draft Plan will increase light pollution/noise pollution. 	<ul style="list-style-type: none"> • All development allocations will need to meet with the requirements of the policy. In addition the allocation policies contain specific mitigation measure to protect environmental amenity where specific issues have been identified including pollution impacts and noise impacts on current and future residents. • National guidance sets out what noise levels are acceptable in developments within the National Policy Statement for England (NPSE). The relevant British Standards are set out in the Council's Environmental Protection SPD. Noise and acoustic mitigation is expected in the design of all developments with additional guidance contained in the Council's Design and Construction SPD. • The NPPF requires that developments limit the impact of light from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The policy reflects this position and 15.b. where light pollution and impacts on the night sky may be subject to planning conditions to mitigate impacts or to provide for compensatory measures. • As part of the planning process, any new developments will be assessed for any impacts on air quality, noise and lighting.
<ul style="list-style-type: none"> • The policy does meet the needs of the area 	<ul style="list-style-type: none"> • The policy follows national planning guidance on the obligations placed on Local Authorities to protect and enhance the environment and the amenity of its area as set of in the NPPF chapter 2 Achieving Sustainable Development. In addition the allocation policies contain specific mitigation measure to protect environmental amenity where specific issues have been identified including pollution impacts and noise impacts on current and future residents.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • Concerns that development proposals in the draft Local Plan for Warrington will worsen air quality and that the housing allocations will mean that the Council will not meet the 17 point Air Quality Plan. 	<ul style="list-style-type: none"> • All development allocations will need to meet with the requirements of the policy. In addition the allocation policies contain specific mitigation measure to protect environmental amenity where specific issues have

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
	<p>been identified including pollution impacts and noise impacts on current and future residents.</p> <ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised.
<ul style="list-style-type: none"> • The Air Quality Management Study has not been updated, the existing Air Quality Management study is also flawed as it takes no account of the canal crossings and closure of the road bridges and reflects the Multi Modal Transport Model. 	<ul style="list-style-type: none"> • The Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the Updated PSVLP (2021) is proposing a lower level of development. The existing report is therefore considered to assess a ‘worst case’ scenario. Updated air quality modelling has however informed the Updated Habitats Regulation Assessment (2021). • The Council carries out an annual assessment of air quality. The 2021 report assessed information at 3 automated sites and non-automatic 31 passive sites. Sites are located on all major road networks in Warrington with monthly and real time data being collected including at locations that will be impacted by Canal crossings and closure of bridges.
<ul style="list-style-type: none"> • The AQM assumes technological changes will happen outside of the draft Plan’s period which will reduce congestion. 	<ul style="list-style-type: none"> • The proposed employment allocations and urban extensions in the Plan are all dependent on infrastructure improvements to the Strategic and Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts. The Local Plan Air Quality Modelling Report concludes that the burden of poor air quality on people’s health is expected to reduce in Warrington in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. In addition, the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. Most

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
	importantly in the context of the Local Plan, planning applications will be closely scrutinised to ensure that air quality has been appropriately considered, to ensure that opportunities to improve air quality are not missed and to ensure that developments that could have a significant detrimental impact are not approved.
<ul style="list-style-type: none"> • The policy seeks to manage the impact of road transport but provides little detail on the impact to be avoided for example Manchester Mosses 	<ul style="list-style-type: none"> • Detailed consideration is given to the impact on road transport on designated ecological assets through the Council's Habitats Regulation Assessment. The Council will continue to work with Natural England and Greater Manchester authorities to ensure any impacts on the Manchester Mosses are properly understood and appropriate mitigation is provided. This is confirmed in the Council's Statement of Common Ground.
<ul style="list-style-type: none"> • The draft plan fails to address poor air quality and is prejudicial to a brownfield first approach for development. Combined with poor public transport in the outer areas of Warrington this will lead to car dependency exacerbating air pollution and traffic noise in south Warrington. The rise in electric vehicles is unlikely to off-set the impact of 4,000 new homes in south Warrington. 	<ul style="list-style-type: none"> • The proposed allocations in the Plan are dependent on infrastructure improvements to the Strategic and Local Road Networks in order to reduce congestion and mitigate any air quality and noise pollution impacts. The Local Plan Air Quality Modelling Report concludes that the burden of poor air quality on people's health is expected to reduce in Warrington in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. In addition, the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. Most importantly in the context of the Local Plan, planning applications will be closely scrutinised to ensure that air quality has been appropriately considered, to ensure that opportunities to improve air quality are not missed and to ensure that developments that could have a significant detrimental impact are not approved.
<ul style="list-style-type: none"> • The objectives of the policy are contradicted by the allocation policies. 	<ul style="list-style-type: none"> • All development allocations will need to meet with the requirements of the policy. In addition the allocation policies contain specific mitigation measure to protect environmental amenity where specific issues have

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
	been identified including pollution impacts and noise impacts on current and future residents.
Landowner/Developer	
<ul style="list-style-type: none"> The policy highlights that there is a need to consider the impact on air quality seriously and the need to plan for investment in public transport and encouraging its use. However the site allocations do not reflect these objectives and will have an increased longer term impact including an increased impact on Manchester Mosses. 	<ul style="list-style-type: none"> All development allocations will need to meet with the requirements of the policy. In addition the allocation policies contain specific mitigation measure to protect environmental amenity where specific issues have been identified including pollution impacts and noise impacts on current and future residents. Detailed consideration is given to the impact on road transport on designated ecological assets through the Council's Habitats Regulation Assessment. The Council will continue to work with Natural England and Greater Manchester authorities to ensure any impacts on the Manchester Mosses are properly understood and appropriate mitigation is provided. This is confirmed in the Council's Statement of Common Ground.
<ul style="list-style-type: none"> One of the Principal Landowners of the South East Warrington Employment Area considers this allocation should be omitted from Part 4 of the policy given that the allocation is not on the M62 and is some distance to Manchester Mosses SAC. 	<ul style="list-style-type: none"> The motorway network surrounding Warrington is interconnected and supports distribution of traffic in all directions. This includes traffic from the M56 and M6 that may come from the proposed allocation at M6 and head toward the M62 to travel toward Manchester and the north east of England or head to the Liverpool and to ferry terminal in the Port of Liverpool.
<ul style="list-style-type: none"> There is objection to vehicle and HGV numbers specified in the policy at point 4, it is remarked that these are significantly lower than in the previous 2019 draft Plan. The numbers appear to be arbitrary. 	<ul style="list-style-type: none"> The Policy has been developed taking into account the Plan's Habitats Regulation Assessment, and through ongoing Duty to Cooperate discussions with Natural England.
<ul style="list-style-type: none"> A promoter of allocation sites within the outlying settlements is concerned that Part 8 requires development proposals to demonstrate that any loss of the best and most versatile agricultural land will be minimised. In some instances, the public benefits of development outweigh the economic and other benefits of retaining agricultural land. Indeed, the Plan has already concluded this to be the case in proposing to 	<ul style="list-style-type: none"> The allocation of the sites in the plan looks to support release of these sites. The policy ENV8 should be understood with regard to the whole plan. This policy will protect against any further development of high grade agricultural land within the borough just as the release of Green Belt site and the GB1 policy seeks to ensure the permanence of future Green Belt boundaries.

Policy ENV8 - Environmental and Amenity Protection	
Summary of Issues Raised	Response
release sites from the Green Belt and allocate them for development, including the land north of Winwick (Policy OS6).	
Statutory Consultees	
<ul style="list-style-type: none"> • The Coal Authority supports the inclusion of this policy specifically those points which seek to ensure that development proposals need to take account of the potential risks posed by unstable land. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • United Utilities suggest the following wording amendment at paragraph 9.8.10 <i>'On land within and adjacent to Groundwater Source Protection Zone 1, the mitigation measures should include the highest specification'</i> 	<ul style="list-style-type: none"> • The Council is confident the Policy is sound and provides an appropriate level of detail to address this issue.
<ul style="list-style-type: none"> • United Utilities suggest the following wording amendment at point 10 <i>'New development within Groundwater Source Protection Zones will require the following:</i> <ul style="list-style-type: none"> <i>a. risk assessment and mitigation strategy with respect to groundwater protection to manage the risk of pollution to public water supply and the water environment;</i> <i>b. careful masterplanning to mitigate the risk of pollution to the public water supply and the water environment;</i> <i>c. A Construction Management Plan</i> 	<ul style="list-style-type: none"> • The Council is confident the Policy is sound and provides an appropriate level of detail to address this issue.
Other	
<ul style="list-style-type: none"> • CPRE is broadly supportive. They welcome reference to avoiding light pollution, particularly in areas of relative dark skies but would also like to see tranquillity specifically referred to. 	<ul style="list-style-type: none"> • The Council is confident the Policy is sound and provides an appropriate level of detail to address this issue.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust broadly support this policy but would like to see stronger wording. This include at point 4 "...Any proposals that would result in increased traffic flows on the M62 past the Manchester Mosses SAC of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day must include a scheme specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles. The scheme must be considered acceptable by the Council and be implemented in full." 	<ul style="list-style-type: none"> • The Council is confident the Policy is sound and provides an appropriate level of detail to address this issue.

Policy MD1 - Waterfront	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Landowner/Developer	
<ul style="list-style-type: none"> • A number of developers consider there is a significant risk that the delivery of the site could be delayed due to the need for the Western Link which requires a detailed business case to be ratified and a comprehensive land acquisition/CPO process to be undertaken. It is therefore considered that the site will deliver significantly less homes in the Plan Period. 	<ul style="list-style-type: none"> • The Council remains committed to the development of the Western Link and following the completion of outline design works has submitted a planning application for the scheme. Validation of this application is currently awaited as the Council is currently carrying out a Gateway Review with various parties, prior to progressing the full, detailed business case for submission to the Department of Transport. In accordance with para 59 PPG Plan Making, the Council is confident it is able to demonstrate that there is a reasonable prospect of the scheme being delivered. • Whilst this process may result in a minor delay from the programme that was used to inform housing completions on the Waterfront allocation site in the Updated PSVLP 2021, the Council does not consider this will materially affect the number of completions in the Plan Period. • In the event there is a more significant delay to the Western Link programme then the Council will address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review. The Council is confident that there would be sufficient time to undertake a review prior to any transport impacts becoming apparent and to address any issues with the Plan's housing land supply.
<ul style="list-style-type: none"> • A number of developers have questioned whether allocation is viable and will be able to deliver a policy compliant level of affordable housing, given the Council's own viability evidence raises viable concerns. 	<ul style="list-style-type: none"> • The Council acknowledges that the Waterfront Allocation is assessed as unviable in the base case testing in the Local Plan Viability Assessment 2021. However, the Local Plan Viability Assessment includes additional sensitivity testing for the Waterfront Allocation by making minor

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	<p>adjustments to certain key inputs to demonstrate potential realistic scenarios under which the allocation could reach a viable position.</p> <ul style="list-style-type: none"> • Following the conclusion of the Regulation 19 consultation, the Council has undertaken an addendum to its Local Plan Viability Assessment. This includes more detailed site specific consideration of these scenarios, taking into account more recent market evidence and schemes coming forward for development in the inner Warrington area. • It should also be noted that the Plan contains flexibility in terms of affordable housing provision and planning obligations should be viability be demonstrated to be a constraint at the planning application stage. • As such, the Council is confident that it is able demonstrate there is a reasonable prospect that the proposals for the Waterfront can be developed within the timescales envisaged in accordance with para 59 PPG Plan Making.
<ul style="list-style-type: none"> • Promoters of a site excluded from the Updated PSVLP consider that the Council has selected strategic sites for allocation at SEWUE, Warrington Waterfront and Thelwall Heys for residential development through reliance on a very limited evidence base. They reason that the Council should commission a full environmental and technical evidence base in relation to these sites to enable their relative merits and sustainability to be assessed and compared on a fair and equal basis with other reasonable development options. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan’s objectives and SA/SEA site assessment criteria to establish that the suitability of sites. • The Council has also undertaken a detailed assessment of infrastructure required to deliver these allocations and assessed each of the allocations through its Local Plan Viability Assessment.
<ul style="list-style-type: none"> • The owner of Port Warrington and the land for the associated commercial park consider that that In order to provide more flexibility and choice in supply and to meet the specific need for growth at the Port, MD1 should be amended and the land-use allocations for Port Warrington and Warrington Commercial Park be reinstated. Whilst this approach is the strong preference, an alternative policy approach would be to safeguard Port Warrington and Warrington Commercial Park to meet future development needs beyond the Plan period but also support 	<ul style="list-style-type: none"> • Although proposed to be allocated in the previous PSVLP 2019, extending the Port will result in loss of part of Moore Nature Reserve and there are significant concerns regarding the potential impact on the Western Link. • In particular, to mitigate the impact on the Western Link it is likely that significant additional capacity will need to be provided at the junctions of the Western Link and the A57 and the A56. The scale of improvements required to these junctions is likely to raise significant engineering, deliverability and viability issues.

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<p>their development during this Plan period through a criteria based policy which would determine the need for the proposals. It is argued that rather than being a high priority in the draft Plan, the plan does not take into account the specialist justification and need for an expanded Port Warrington to Peel Ports who are a leading maritime business and the primary facilitator in the movement of national and international freight imports and exports across the North West economy. This is not consistent with national planning policy.</p>	<ul style="list-style-type: none"> • The Council is however committed to undertaking a review into Warrington’s employment land needs before the end of the Plan period to ensure the long term supply of employment land. By this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England supports the proposed policy and Heritage Impact Assessment (HIA) and also welcomes the reference to the Transporter Bridge and the Plan’s positive approach to securing the future of this heritage asset at risk. The Plan can demonstrate that the site can be developed without harm to the historic environment. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • United Utilities recommends that under the <i>Utilities and Environmental Protection</i> section of the proposed allocation policy, additional text is provided to ensure that their own assets within the site boundary can continue to be accessed and will be considered within the design of the development. United Utilities also point out that this site is currently not served by water and wastewater infrastructure. Therefore, to accommodate the proposed growth in this area United Utilities would welcome early engagement in relation to the use of the Western Link Road as a means of providing water and wastewater infrastructure. 	<ul style="list-style-type: none"> • The policy is already comprehensive and the Council is confident that the key areas of concern are dealt with appropriately. The Council is committed to working with United Utilities as proposals are worked up in more detail through the preparation of the Development Framework for the allocation.
<ul style="list-style-type: none"> • The Chief Constable Cheshire Police (CCCC) consider that the impact of this site upon the Police and other Emergency services is not recognised or accounted for. This is in contrast to the site specific requirements for all other infrastructure and service providers (health, education, green and natural infrastructure, transport and utilities etc) which are explicitly covered in the site allocation policies. The CCCC, therefore request that policy be amended to include specific policy recognition of the need for 	<ul style="list-style-type: none"> • The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.

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<p>additional Police infrastructure, in line with national policy requirements. In order to make the plan sound, the following additional principle should be added under the <i>Detailed Site-specific Requirements</i> section: “Appropriate emergency services infrastructure”</p>	
<ul style="list-style-type: none"> • National Highways - The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered and that an area-wide Travel Plan is implemented on the site. 	<ul style="list-style-type: none"> • Support noted. The Council has engaged extensively with National Highways and will continue to do so.
Other	
<ul style="list-style-type: none"> • Cheshire Wildlife Trust (CWT) welcomes the significant reduction in scale of this allocation but disagree that any residual risk of functionally linked habitat loss is now removed as a result of the reduced scope of the allocation, as concluded in the Updated Habitats Regulations Assessment (HRA). In addition, due to the proximity of the Warrington Waterfront allocation site to the proposed Fiddlers Ferry (MD3) allocation and the Warrington Western Link any ecological impacts arising as a result of any of these proposed schemes should be assessed in-combination. • Concerns are also raised in respect of the close proximity to two Local Wildlife Sites - Walton Locks and Moore Nature Reserve – and the ability of the site to mitigate impacts and secure biodiversity net gain due to the current high value of the site. 	<ul style="list-style-type: none"> • Paragraphs 4.3 to 4.14 of the Updated HRA (2021) discuss the potential for losses of functionally linked land due to development in Warrington Waterfront (MD1), South East Warrington Urban Extension (MD2) and Fiddler’s Ferry (MD3), drawing on survey data as far as it exists either from site-specific surveys or the Cheshire Bird Atlas. Therefore, they have all been considered cumulatively and in combination. The determination of whether a parcel of land is likely to constitute significant functionally-linked habitat utilises a ‘1% of the SPA population’ threshold specifically in order to capture the fact that, while 1% of the population is a small percentage, cumulative losses of land parcels supporting 1% of the population can be significant ‘in combination’. The potential for a site to serve as functionally-linked land cannot be excluded until several seasons of survey have been undertaken and this is why paragraph 4.10 of the HRA (and the policy text of allocations MD1 to MD3) identify the need for project level HRA accompanied by the necessary wintering bird surveys in order to close out the issue. This is a common approach to dealing with functionally-linked land in Local Plans and takes account of Advocate-General Kokott’s advice that <i>‘It would also hardly be proper to require a greater level of detail in preceding plans [than lower tier plans or planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather,</i>

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	<p><i>adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure’.</i> This approach also takes account of the fact that these developments will be delivered over long timescales over the course of the plan period and ecological surveys will therefore need repeating and updating to accompany planning applications. This approach therefore avoids considerable time and expense being undertaken doing potentially redundant survey work.</p> <ul style="list-style-type: none"> • The policy in the Updated PSVLP (2021) includes recommendations made previously by CWT (and others) in respect of biodiversity net gain and recommendations from the Updated Habitats Regulation Assessment (2021) in respect of providing evidence that the development will not have any adverse impacts on the integrity of the Mersey Estuary Special Protection Area with regard to Functionally Linked Land. • It should be noted that the requirement for net biodiversity gain has been accounted for in the Local Plan Viability Assessment 2021.

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Residents	
<ul style="list-style-type: none"> • The plan fails to respond to climate change - increasing housing on this scale will increase pollution. 	<ul style="list-style-type: none"> • In line with the requirements of the NPPF the updated Plan is supporting a transition to a low carbon future in a changing climate. The South East Warrington Urban Extension allocation includes specific measures to reduce dependency on the car, support public transport, cycling and walking and increase the energy efficient of new development, including through design. Beyond this, and relevant to the wider plan, Policy ENV7 sets out the Council’s approach to Renewable and Low Carbon Energy Development.
<ul style="list-style-type: none"> • Proposals will threaten the individuality of the villages in south Warrington, including Appleton Thorn, Wright’s Green and Grappenhall which will become one big urban area with no identity. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. In preparing the Plan, the Council has worked closely with statutory consultees including Historic England, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard. • It should also be noted that the proposed South East Warrington Urban provides a significant buffer between the proposed urban extension and Appleton Thorn and Grappenhall village. In addition where new development is proposed close to existing homes residential amenity will be carefully considered at planning application stage.
<ul style="list-style-type: none"> • The proposed plans will create traffic chaos in the south Warrington area. 	<ul style="list-style-type: none"> • A key benefit of the SEWUE is its ability to connect into the existing urban area and extend public transport, walking and cycling links which will

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	<p>help to reduce overall car dependency. The allocation policy requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Warrington Multimodal Transport Model to ensure the transport network can accommodate the proposed level of growth.</p>
<ul style="list-style-type: none"> • The proposed plans will have an impact on air quality in south Warrington. 	<ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • The Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the UPSVLP (2021) is proposing a lower level of development. The existing report is therefore considered to assess a ‘worst case’ scenario. Updated air quality modelling has however informed the updated Habitats Regulation Assessment. • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP (2021) includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality.
<ul style="list-style-type: none"> • There are no details with regard to additional canal crossings. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. This is identified in the Local Transport Plan which also commits the

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	<p>Council to start work to test the feasibility of a new mass transit system for the Borough.</p> <ul style="list-style-type: none"> • Whilst specific details of a connection across the Bridgewater Canal and/or Ship Canal have not yet been identified, Policy MD2 requires that contributions are made towards this so that it can be utilised when the Council is in a position to take this forward. This position will continue to be monitored.
<ul style="list-style-type: none"> • There is a lack of detail as to how public transport will be improved to support the new residential areas. 	<ul style="list-style-type: none"> • The updated PSVLP closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South West Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport. • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP (2021) includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes.
<ul style="list-style-type: none"> • Concern that proposals utilise some of Warrington’s best quality Green Belt when other areas could be developed with far less impact. The loss of Green Belt is not justified and should not be permitted. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington’s development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major

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	<p>brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’.</p> <ul style="list-style-type: none"> • The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the South East Warrington Urban Extension, which will ensure that a major proportion of Warrington’s need for housing can be met sustainably through comprehensive planning and infrastructure delivery. The scale of the urban extension will also provide capacity for growth well beyond the Plan period, ensuring the permanence of the revised Green Belt boundaries. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the sites which comprise this allocation make a weak and moderate contribution to Green Belt purposes. The removal of this allocation from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the south, west and east by the M56, B5356 Stretton Road, Blackcap Road, Broad Lane, A49 Tarporley Road, the Gorse woodland and further sections of dense woodland. Parts of the eastern boundary and the south eastern boundary which currently consist of field boundaries will need to be strengthened to create a new recognisable and permanent Green Belt boundary. This requirement is reflected in the allocation policy.
<ul style="list-style-type: none"> • Brownfield sites, including Fiddlers Ferry, should be used first before allowing Green Belt release. 	<ul style="list-style-type: none"> • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington’s development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options. • A number of brownfield sites in the Plan’s housing supply are not able to come forward until later in the Plan Period, due to issues including land

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	<p>assembly, land remediation and infrastructure constraints. As such, the Council is not able to sequence its land supply to only allow Green Belt development once all brownfield sites have been built out.</p> <ul style="list-style-type: none"> • The UPSVLP (2021) allocates the Fiddlers Ferry Site for development for both employment and residential uses. The employment element of the site will be on brownfield land and will be delivered within the Plan Period. The residential element falls mostly on Green Belt land, the majority of which will also come forward in the Plan Period but with some beyond. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
<ul style="list-style-type: none"> • Concerns about the scale of proposals on land which is currently open countryside and impact on wildlife, flora and fauna. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council has ensured that the allocation policy includes specific provision to protect and enhance ecology and biodiversity and to ensure nature conservation. Where there are impacts on important ecological assets, the Plan requires extensive mitigation to offset the loss of habitat and the allocation policy requires an overall net increase in biodiversity in accordance with the NPPF and the Environment Act 2021. In preparing the Plan, the Council has worked closely with statutory consultees including Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard.
<ul style="list-style-type: none"> • There is no justification for the level of growth proposed. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government’s methodology will meet Warrington’s future housing needs

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	and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the higher housing target in the previous PSVLP 2019. The Council is not proposing an additional uplift to the housing requirement, as was the case with the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID.
<ul style="list-style-type: none"> • New leisure centre, particularly swimming facilities, welcome in south Warrington. 	<ul style="list-style-type: none"> • Support noted and it is recognised that current facilities in south Warrington are already lacking. The allocation policy requires provision of new facilities to support an increased population in south Warrington.
<ul style="list-style-type: none"> • Demand for homes in south Warrington has been over calculated and development should be spread more evenly across the Borough. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release. It considers that the areas of Green Belt release proposed provide the most sustainable way of meeting Warrington’s development needs as part of the Plan’s overall Spatial Strategy whilst ensuring the long term integrity of Warrington’s Green Belt. • It should be noted that the amount of Green Belt release proposed south of the Ship Canal has been significantly reduced in the Updated PSVLP 2021 and that the majority of the new homes proposed in the Plan period will be developed within the main urban area of Warrington, of which the majority will be north of the Ship Canal.
<ul style="list-style-type: none"> • Concerns over the types of houses proposed: not in keeping with the area; too expensive; not suitable for first time buyers, need for high quality flats and bungalows. 	<ul style="list-style-type: none"> • The Council recognises that new development in South Warrington must meet a range of needs and in particular recognises the high property values in this area. The allocation policy has specific requirements to address the needs of first time buyers, affordable housing needs more broadly, housing for the elderly and accessible and adaptable homes suitable for all users. The policy, together with Policy DEV2, further seeks to ensure that affordable homes are genuinely affordable to local people in this part of the Borough.
<ul style="list-style-type: none"> • Concerns about the provision of new schools and the impact on existing schools in the area. 	<ul style="list-style-type: none"> • The allocation policy requires land to be set aside for and contributions to be made towards the provision of new schools (primary and

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	secondary) and other social infrastructure including health, sports and leisure facilities to support the new residential population.
<ul style="list-style-type: none"> Concerns for the impact on the historic environment. 	<ul style="list-style-type: none"> The Council has undertaken a Heritage Impact Assessment of the proposed South East Warrington Urban Extension in consultation with Historic England. Development within the Urban Extension will be required to be designed in order to ensure that heritage assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to Heritage Impact Assessment.
<ul style="list-style-type: none"> There are significant areas of flood risk in South Warrington which the planned development will only worsen. 	<ul style="list-style-type: none"> The Council has undertaken a Strategic Flood Risk Assessment in considering potential development allocations in the updated PSVLP. The vast majority of the allocation is in Flood Zone1. The allocation policy requires a site-wide foul and surface water strategy across the South East Warrington Urban Extension as a whole, incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures. The surface water strategy will be required to improve on greenfield run-off rates and this will be subject to assessment at planning application stage. As such the Council is confident that there will not be increased flooding as a result of the proposed allocation.
<ul style="list-style-type: none"> Plan focuses too much on housing target rather than job creation which should then inform number of houses needed. 	<ul style="list-style-type: none"> The calculation of the number of houses needed in the Borough over the plan period is considered within the context of employment forecasts. The Council is required to demonstrate that there is alignment between new homes and jobs/economic growth and this has been undertaken in support of the Updated PSVLP 2021.
<ul style="list-style-type: none"> There is a lack of detail regarding infrastructure required to support the development. 	<ul style="list-style-type: none"> The allocation policy requires a range of infrastructure to be provided as part of the overall development. This includes roads, public transport, parks, footpaths, cycleways, health and social infrastructure (including schools, leisure, community and retail facilities). Detail regarding the provision of these elements will be worked up in a Development

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	<p>Framework upon adoption of the Plan and prior to development commencing on site.</p>
<ul style="list-style-type: none"> • Funding for infrastructure has not been addressed and it should be in place prior to any development occurring. 	<ul style="list-style-type: none"> • The Council has undertaken the preparation of a comprehensive Local Plan Viability Assessment in support of the Updated PSVLP 2021. As part of this work, the Council has reviewed all infrastructure requirements and costs for the South East Warrington Urban Extension in consultation with the principal landowners promoting the allocation. This work demonstrates that the infrastructure required to deliver the urban extension is capable of being delivered. • The allocation policy and the Development Framework will ensure the timely delivery of supporting infrastructure. This is important given the existing constraints on transport and community infrastructure in South Warrington.
<ul style="list-style-type: none"> • South East Urban Extension will create car dependent suburbs which is contrary to the wider climate change agenda. 	<ul style="list-style-type: none"> • A key benefit of the SEWUE is its ability to connect into the existing urban area and extend public transport, walking and cycling links which will help to reduce overall car dependency. • The Updated PSVLP 2021 closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South East Warrington Urban Extension, and other allocations in the Plan promote active transport and are well served by public transport. • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP 2021 includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to develop high quality cycling and walking routes through its Local Cycling and Walking Infrastructure Plan and to start work to test the feasibility of a new mass transit system for the

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	Borough and the allocation policy requires on site safeguarding of potential mass transit routes.
<ul style="list-style-type: none"> • New housing not close to appropriate employment opportunities and therefore new areas of housing will become commuter developments. 	<ul style="list-style-type: none"> • An underlying principle of the Spatial Strategy is to ensure that new development contributes to the growth of Warrington as a whole, encouraging more people to live and work in the Borough. By focussing the majority of new residential development within the existing urban area, of which the majority will be located north of the Ship Canal, the Spatial Strategy is ensuring that a large number of new homes will benefit from being in proximity to established and newly developed employment locations. Through ensuring improvements to transport infrastructure, new and existing residents in south Warrington will be able to access these employment opportunities. The South East Warrington Employment Area will provide a major new employment site in south Warrington. This will provide a range of jobs, but the Council acknowledges that the predominant uses will be warehousing and distribution and therefore there will be a relatively large number of lower skilled jobs. This emphasises the importance of providing a wide range of housing types in the proposed South East Warrington urban extension, including provision of 30% affordable housing, to ensure that employees have the opportunity to live in close proximity to their work. The Council also recognises the importance of improving transport links to the new employment locations, particularly in respect of public transport, walking and cycling.
<ul style="list-style-type: none"> • Concern that there are no specific youth facilities proposed within the development. 	<ul style="list-style-type: none"> • At this stage, the level of detail required to inform the allocation within the local plan is broad, although the main uses and potential locations have been identified. It has been recognised that there is a need for community facilities in this area – this will have the potential to accommodate youth groups along with other local groups. The next stage of work will involve the preparation of a Development Framework which will include a greater level of detail as to what exactly will be delivered

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	within different parts of the SEWUE. There will be a further opportunity to comment on this document as it is being prepared.
<ul style="list-style-type: none"> • Concern over the impact of the proposals on Stockton Heath which is already under strain and very congested. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 closely reflects the Council’s new Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South East Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport. • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP 2021 includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to develop high quality cycling and walking routes through its LCWIP and to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes. • The modelling carried out for the draft Local Plan, using the Warrington Multimodal Modal Transport model acknowledges that certain parts of the network, including the A49 will need further assessment and targeted interventions throughout the course of the plan’s delivery.
<ul style="list-style-type: none"> • There will be limited provision of affordable homes as the prices in south Warrington are higher than in the rest of the borough. 	<ul style="list-style-type: none"> • New development in south Warrington will be required to provide 30% affordable housing. Policy DEV2 requires that two thirds of this should be affordable for rent, which will be for people on the Council’s housing waiting list. A third should be for low cost home ownership, of which the majority will be ‘First Homes’ specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers. With regard to rents the Policy includes a

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	safeguard that rents should not exceed the Local Housing Allowance rates.
<ul style="list-style-type: none"> • Concentrating development in south Warrington will not support the regeneration of the town centre 	<ul style="list-style-type: none"> • The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential economic benefits of focussing development, including that proposed in South Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from South Warrington.
<ul style="list-style-type: none"> • Concerns about Green Lane and how this will be impacted by the development as it is a valuable and well used walkway. 	<ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP 2021 includes a range of measures to promote active transport, including walking and cycling, with an emphasis on linking the new development to existing routes and existing green infrastructure where possible, as well as enhancing this provision throughout the urban extension. The next stage of work will involve the preparation of a Development Framework which will include a greater level of detail as to what exactly will be delivered within different parts of the SEWUE. There will be a further opportunity to comment on this document as it is being prepared.
<ul style="list-style-type: none"> • There is uncertainty over the nature of the proposed local centres and concerns they could result in ‘out of town’ retailing. 	<ul style="list-style-type: none"> • The Policy is clear at point 16 that the Urban Extension should provide local shops and appropriate local services and community facilities. Further detail on the location of the local centres and their respective uses will be provided in the Development Framework. The Policy makes specific reference to Policy DEV5 to ensure that new retail development is of an appropriate scale for the local centres.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • Location of SEWUE is too constrained for the level of development proposed and existing infrastructure is inadequate. 	<ul style="list-style-type: none"> • The need for new infrastructure has been assessed in detail with relevant Council and partner service providers. As such the Council is confident the level of development proposed can be sustainably accommodated

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	<p>subject to the delivery of the infrastructure requirements set out in the allocation policy and the Infrastructure Delivery Plan.</p> <ul style="list-style-type: none"> • The allocation policy and the Development Framework will ensure the timely delivery of supporting infrastructure. This is important given the existing constraints on transport and community infrastructure in South Warrington.
<ul style="list-style-type: none"> • Concerns regarding poor provision for public transport in South Warrington. 	<ul style="list-style-type: none"> • The Updated PSVLP 2021 closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South East Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport. • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP 2021 includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes.
<ul style="list-style-type: none"> • No justification for scale of Green Belt release. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington’s development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’.

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	<ul style="list-style-type: none"> • The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the South East Warrington Urban Extension, which will ensure that a major proportion of Warrington’s need for housing can be met sustainably through comprehensive planning and infrastructure delivery. The scale of the urban extension will also provide capacity for growth well beyond the Plan period, ensuring the permanence of the revised Green Belt boundaries. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the sites which comprise this allocation make a weak and moderate contribution to Green Belt purposes. The removal of this allocation from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the south, west and east by the M56, B5356 Stretton Road, Blackcap Road, Broad Lane, A49 Tarporley Road, the Gorse woodland and further sections of dense woodland. Parts of the eastern boundary and the south eastern boundary which currently consist of field boundaries will need to be strengthened to create a new recognisable and permanent Green Belt boundary. This requirement is reflected in the allocation policy
<ul style="list-style-type: none"> • Brownfield sites should be developed before any Green Belt release. 	<ul style="list-style-type: none"> • In meeting the requirements of the NPPF, the Council is required to ensure that Warrington’s development needs will be met in full over the whole Plan period. The Council has demonstrated through the update of the SHLAA that there are insufficient non-Green Belt sites to accommodate its future development needs and is only proposing Green Belt release having exhausted all other options. • A number of brownfield sites in the Plan’s housing supply are not able to come forward until later in the Plan Period, due to issues including land assembly, land remediation and infrastructure constraints. As such, the

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	Council is not able to sequence its land supply to only allow Green Belt development once all brownfield sites have been built out.
<ul style="list-style-type: none"> • Concern about ability to truly deliver affordable housing. 	<ul style="list-style-type: none"> • New development in south Warrington will be required to provide 30% affordable housing. Policy DEV2 required that two thirds is for affordable rent, which will be for people on the Council’s housing waiting list. A third should be for low cost home ownership, of which the majority will be ‘First Homes’ specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers. With regard to rents the Policy includes a safeguard that rents should not exceed the Local Housing Allowance rates.
<ul style="list-style-type: none"> • There are no specific proposals for additional crossings over various watercourses. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. This is identified in Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough. • Whilst specific details for a crossing over the Bridgewater Canal have not yet been identified, Policy MD2 requires that contributions are made towards this so that it can be utilised when the Council is in a position to take this forward. This position will continue to be monitored.
<ul style="list-style-type: none"> • Infrastructure proposed will not deal with congestion generated from the level of development. 	<ul style="list-style-type: none"> • The allocation policy requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Warrington Multimodal Transport Model to ensure the transport network can accommodate the proposed level of growth.

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<ul style="list-style-type: none"> • The funding for the infrastructure provision should be identified and in place before the start of any development. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive Local Plan Viability Assessment in support of the Updated PSVLP (2021). As part of this work, the Council has reviewed all infrastructure requirements and costs for the South East Warrington Urban Extension in consultation with the Principal Landowners promoting the allocation. This work demonstrates that the infrastructure required to deliver the urban extension is capable of being delivered. • The allocation policy and the Development Framework will ensure the timely delivery of supporting infrastructure. This is important given the existing constraints on transport and community infrastructure in South Warrington.
<ul style="list-style-type: none"> • Specific concerns about the delivery of the new strategic route to relieve the Cat & Lion junction which should be in place prior to development commencing. 	<ul style="list-style-type: none"> • The draft policy states that no residential development will be permitted to commence until the funding and the programme for the delivery of a highway scheme to relieve the Cat & Lion junction has been confirmed and works have commenced on site. In addition, a limit of housing completions will be set until such a scheme is complete and operational.
<ul style="list-style-type: none"> • No consideration of additional measures for cyclists. 	<ul style="list-style-type: none"> • The South East Warrington Urban Extension allocation includes specific measures to reduce dependency on the car and in particular encourage cycling and walking through the provision of a significant amount of green infrastructure and dedicated cycling infrastructure.
<ul style="list-style-type: none"> • No assessment of the impact of development on Stockton Heath. 	<ul style="list-style-type: none"> • The impact of the SEWUE on nearby villages and centres has been considered as part of the Local Plan options assessment process. • The allocation requires the provision of additional local centres to provide community facilities which will complement those available in Stockton Heath. • In terms of congestion, the Updated PSVLP 2021 closely reflects the Council's Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan's Spatial Strategy and that the Main Development Areas, including the South West

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	<p>Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport.</p> <ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP (2021) includes a range of measures to improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes. • The modelling carried out for the draft Local Plan, using the Warrington Multimodal Modal Transport model acknowledges that certain parts of the network, including the A49 will need further assessment and targeted interventions throughout the course of the plan’s delivery.
<ul style="list-style-type: none"> • Development envelopes Stretton, Appleton Thorn, and Grappenhall Village. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. In preparing the Plan, the Council has worked closely with statutory consultees including Historic England, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard • It should also be noted that the proposed South East Warrington Urban provides a significant buffer between the proposed urban extension and Appleton Thorn and Grappenhall village. In addition where new

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	development is proposed close to existing homes residential amenity will be carefully considered at planning application stage
<ul style="list-style-type: none"> • Assessment of environmental impacts is limited. 	<ul style="list-style-type: none"> • The Council is confident that the impacts of the South East Warrington Urban Extension have been fully assessed through the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) and a suite of evidence base documents have informed the plan and are available to view. Further details of these impacts will be assessed in the preparation of the Development Framework and at the planning application stage.
<ul style="list-style-type: none"> • Contradicts provisions of TC1 and proposed enhancements to the town centre. 	<ul style="list-style-type: none"> • The Council considers that the proposed Spatial Strategy will positively contribute to enhancing Warrington Town Centre due to the potential economic benefits of focussing development, including that proposed in South Warrington, in relative proximity to the town centre. The infrastructure proposed to support the Spatial Strategy will enhance the accessibility of Warrington Town Centre for existing as well as new residents, including those from South Warrington.
<ul style="list-style-type: none"> • Support for development in South Warrington and much recent development has been in the north of the Borough. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • The air quality will worsen in South Warrington as a result of these proposals which is contrary to other policies in the plan. 	<ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP 2019 concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • The Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the updated PSVLP 2021 is proposing a lower level of development. The existing report is therefore considered to

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	<p>assess a ‘worst case’ scenario. Updated air quality modelling has however informed the updated Habitats Regulation Assessment.</p> <ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP (2021) includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality.
<ul style="list-style-type: none"> • Concerns that the proposals will lead to increased traffic from both new residents of the housing and HGV traffic resulting from the industrial areas allocated. 	<ul style="list-style-type: none"> • The revised South East Warrington Urban Extension allocation is significantly smaller than the previous Garden Suburb allocation and will correspondingly generate less traffic. The allocation policy requires on-site and off-site improvements to transport infrastructure, with the phasing of development controlled to ensure these improvements are delivered in a timely manner. The Council has tested the level of development, together with the required infrastructure improvements through its Local Plan Transport model to ensure the transport network can accommodate the proposed level of growth. • The separate South East Warrington Employment Area policy states that employment development will not be commenced until the funding and the programme for delivery of improvements at Junction 20 of the M6 have been agreed with key stakeholders, including Highways England and the Local Highway Authority. Additional infrastructure improvements required by the allocation policy will ensure that HGV traffic is able to efficiently access the motorway. As such, the Council is confident that HGV traffic will not have a detrimental impact on existing and future residential areas in south Warrington.
<ul style="list-style-type: none"> • Poor provision for public transport will lead to increased car journeys 	<ul style="list-style-type: none"> • The updated PSVLP 2021 closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South West Warrington Urban

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	<p>Extension, and other allocations in the Plan are able to be well served by public transport.</p> <ul style="list-style-type: none"> • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP 2021 includes a range of measures to improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes.
<ul style="list-style-type: none"> • The individual characteristics of the village settlements have been overlooked. 	<ul style="list-style-type: none"> • The Council has taken the character of existing settlements into account in assessing development options for the Updated PSVLP 2021. The Development Framework will further take into consideration the nearby village settlements and their characteristics will be respected.
Landowner/Developer	
<ul style="list-style-type: none"> • Support for the principle of the South East Urban Extension from the principal landowners promoting the allocation. 	<ul style="list-style-type: none"> • Support noted. The Council welcomes the submission of the Deliverable Allocation document which has been submitted by the principal landowners in promoting the site and demonstrating its deliverability.
<ul style="list-style-type: none"> • There are a number of changes proposed to the policy by the principal landowners. The majority of these do not consist of material changes but seek to streamline the policy and make it more effective. A number of changes proposed are more significant and refer to additional evidence/justification for infrastructure requirements, in particular education provision. 	<ul style="list-style-type: none"> • The Council is confident that the policy as it stands is sound. • The infrastructure identified within draft Policy MD2 and the IDP has been identified through specific needs which the proposed SEWUE gives rise to and as agreed with relevant internal Council services and partner service providers. This includes consideration for the process applied by the Council to project pupil yield from a development and determine if there is a need to create additional school places in the area to mitigate the impact of the development on existing school provision. The Council is confident that the infrastructure requirements set out in Policy MD2 are justified to support the proposed urban extension. • Non-material changes identified may be considered as minor modifications if the appointed Inspector is of the view that these will improve the policy.

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	<ul style="list-style-type: none"> • The Council will continue to work with the Principal Landowners to firm up requirements through the Development Framework.
<ul style="list-style-type: none"> • Reference to the improved connection to A50 should be removed as this would require third party land. 	<ul style="list-style-type: none"> • The policy accurately refers to the need to ensure that vehicles from the urban extension are able to efficiently access the A50. It does not specify the need for a direct connection.
<ul style="list-style-type: none"> • Broad support for SEWUE as there is a significant need for additional high quality housing in this part of the borough. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • Concern that the SEWUE doesn't plan for a 30 year vision and the full Garden Suburb allocation from the previous PSVLP 2019 should be reinstated. This would also allow for a greater level of infrastructure to be provided, better mitigation measures and provide more robust Green Belt boundaries. 	<ul style="list-style-type: none"> • The Council is confident that the proposed SEWUE is in line with the requirements of the NPPF in terms of its requirement to look beyond the plan period to a 30 year vision. An element of the proposed urban extension will fall beyond 2038 providing an additional c.1,800 homes. This has been backed up by detailed discussions with landowners in terms of realistic delivery rates and timescales, the output of which are documented in the Council's evidence base. By adopting this longer term vision the amended Green Belt boundaries are considered to be robust. • The Council considers that the level of infrastructure proposed is appropriate and proportionate to the level of development proposed within the South East Warrington Urban Extension. Indeed, if a greater level of development were proposed then a greater level of infrastructure would be expected to mitigate the impact of development. It is important to consider that the larger Garden Suburb as proposed in the Previous PSVLP 2019 could not be considered deliverable for a number of reasons but most notably due to the large number of landowners involved and the delivery of infrastructure. In any case, the SEWUE contributes to providing the required level of housing across the Borough and there is no justification for exceeding this. • The Council is confident that the proposed amended Green Belt boundaries identified are robust and will endure well beyond the plan period. Where proposed boundaries are currently considered to be weaker, these will be strengthened appropriately.

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<ul style="list-style-type: none"> • Concern that proposed amended Green Belt boundary has been determined by land ownership rather than the policy direction intended in NPPF. There is a particular concern that the eastern boundary is not durable. 	<ul style="list-style-type: none"> • The boundary has not been determined solely on land ownership but has been informed by realistic options for an urban extension, taking into account existing boundaries and landscape features. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the sites which comprise this allocation make a weak and moderate contribution to Green Belt purposes. The removal of this allocation from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the south, west and east by the M56, B5356 Stretton Road, Blackcap Road, Broad Lane, A49 Tarporley Road, the Gorse woodland and further sections of dense woodland. • It is acknowledged that parts of the eastern boundary and the south eastern boundary which currently consist of field boundaries will need to be strengthened to create a new recognisable and permanent Green Belt boundary. This requirement is reflected in the allocation policy with the detail to be firmed up in the Development Framework.
<ul style="list-style-type: none"> • Limited evidence to demonstrate deliverability and extent to which this represents a sustainable site compared to other potential sites in other parts of the Borough. 	<ul style="list-style-type: none"> • The Council has undertaken the preparation of a comprehensive Local Plan Viability Assessment in support of the Updated PSVLP 2021. As part of this work, the Council has reviewed all infrastructure requirements and costs for the South East Warrington Urban Extension in consultation with the principal landowners promoting the allocation. This work demonstrates that the infrastructure required to deliver the urban extension is capable of being delivered. • The Council is confident that development of the SEWUE represents the most sustainable option for development when all other sites are considered and this is demonstrated through the options assessment work, Sustainability Appraisal and other supporting evidence base documents.

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<ul style="list-style-type: none"> • The lead in times and delivery rates for the SEWUE are considered to be realistic and the site is capable of delivering the level of housing set out in the housing trajectory. 	<ul style="list-style-type: none"> • Support noted. The Council, together with landowners, has carried out detailed analysis of site capacity and realistic delivery rates, taking into account necessary infrastructure provision.
<ul style="list-style-type: none"> • Clarification sought on land falling out with the allocation but in the existing (current) Green Belt and surrounded by the proposed allocation will fall outside of SEWUE allocation but will no longer be designated Green Belt land. 	<ul style="list-style-type: none"> • This assumption is correct. Such areas will become part of the main urban area but will not be covered by the proposed allocation under Policy MD2. This is identified clearly on the Policies Map.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England supports the inclusion of a Heritage Impact Assessment in the policy requirements. The proposed policy ensures that development will be required to preserve and enhance the historic environment. 	<ul style="list-style-type: none"> • The Council has engaged extensively with Historic England in relation to the South East Warrington Urban Extension and the support is welcomed.
<ul style="list-style-type: none"> • United Utilities Ltd (UU) have proposed additional text to ensure that their own assets within the site boundary can continue to be accessed and will be considered within the design of development plots. 	<ul style="list-style-type: none"> • The policy is already comprehensive and the Council considers that this additional text is not necessary as the existing UU assets will need to be factored in to development proposals in any case. The detail of this matter will be dealt with within the Development Framework Specific detail on utility requirements is also provided in Policy INF3..
<ul style="list-style-type: none"> • Cheshire Constabulary – the impact of this site upon Police and other Emergency services is not recognised or accounted for. The needs of all other services/infrastructure is addressed in the policy and therefore it is requested that the policy be amended to address this additional specific need. 	<ul style="list-style-type: none"> • The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
<ul style="list-style-type: none"> • National Highways – raise no concerns with the allocation and note that it is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered, and that an area-wide Travel Plan is implemented on the site. 	<ul style="list-style-type: none"> • Comments noted. The Council has engaged extensively with National Highways and will continue to do so.
<ul style="list-style-type: none"> • Cheshire West and Chester Council – recognises the work that has been undertaken and the commitment to working with neighbouring 	<ul style="list-style-type: none"> • Comments noted. The Council continues to work with CWAC Council as set out in the Statement of Common Ground.

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<p>authorities and key bodies such as Highways England. CWAC would like to fully understand the impact on the Strategic road network as well as its own network and welcomes continued dialogue in this regard.</p>	
<p>Other:</p> <ul style="list-style-type: none"> • Rethinking South Warrington’s Future – Object to the level of development proposed in South Warrington. Significant constraints on south Warrington’s infrastructure means it cannot support the level of development proposed. Existing congestion and air quality problems. Also particular concerns about the proposed changes to the Cat & Lion junction – this should link straight to the motorway junction (J10,M56). 	<ul style="list-style-type: none"> • Draft Policy MD2 makes significant provision for the delivery of infrastructure and detailed discussions have been held with the Council’s service providers, as well as other external bodies, to ensure that the needs of development can be met. In particular in terms of proposed road infrastructure. • The updated PSVLP 2021 closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South West Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport. • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP (2021) includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes. • As assessment of the options available to improve the Cat & Lion junction has been made and it is considered that there are a number of potential alignments within land controlled by developers which will allow an appropriate connection on to the A49 and wider strategic highway network. The exact form and location will be examined through the Development Framework process.

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<ul style="list-style-type: none"> • Pewterspear Green Trust Ltd – Concern about the level of development proposed adjacent to the trust’s land. Funding will be required from the development to support the trust’s increased costs arising from the development in this area. Concerns also regarding drainage. The trust’s green spaces should be considered as a key component to the ‘green corridors’ proposed. The trust’s Sport’s Pavilion could be further expanded to form a new local centre. 	<ul style="list-style-type: none"> • Comments and concerns noted. The Council will continue to liaise with groups and organisations in the local area, particularly during the preparation of the Development framework, to pick up these more detailed points.
<ul style="list-style-type: none"> • Stretton NDP – Do not support proposals for the SEWUE. In particular object to the inclusion of the western most part of the allocation (R18/088) which should not be removed from the Green Belt and should not accommodate the proposed new relief road. An alternative route is offered for consideration. Do not support the loss of agricultural land. There is no provision for indoor sport and community activities for young and old people. 	<ul style="list-style-type: none"> • The inclusion of parcel R18/088 is considered to be sensible in terms of the amended Green Belt boundary and the delivery of necessary road infrastructure. • As assessment of the options available to improve the Cat & Lion junction has been made and it is considered that there are a number of potential alignments within land controlled by developers which will allow an appropriate connection on to the A49 and wider strategic highway network. The exact form and location will be examined through the Development Framework process. • Whilst concern for the loss of agricultural land is recognised, the quality of agricultural land formed part of the options assessment process. • Policy MD2 requires that community facilities are provided within the SEWUE and these can accommodate a range of uses. The detail of this will be worked up in the Development Framework which will be adopted post-adoption of the plan and will be consulted upon.
<ul style="list-style-type: none"> • Grappenhall Lawn Tennis Club and Warrington Rugby Football Union Ltd – the impact of development on the two clubs’ facilities has not been considered. Concerns about traffic congestion, air quality and poor drainage infrastructure. Concerns about impact on Bridgewater Canal crossings which are already problematic on match days. Interested in further dialogue with the Council regarding enhanced facilities. 	<ul style="list-style-type: none"> • Concerns noted. Whilst specific details for a crossing over the Bridgewater Canal have not yet been identified, Policy MD2 requires that contributions are made towards this so that it can be utilised when the Council is in a position to take this forward. • The Council is committed to improving sports and leisure facilities as part of the South East Warrington Urban Extension. This will be reviewed in greater detail when the Development Framework is produced and

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	<p>consulted upon post-adoption of the local plan. The Development Framework will consider interaction with neighbouring land uses.</p>
<ul style="list-style-type: none"> • Our Green Warrington – Exceptional circumstances have not been demonstrated for release of Green Belt in this location. Concerns about the impact on the natural and historic environment. No reference to the ecological network of The Mersey Valley Timberland Trail which will be directly impacted by the SEWUE. Concerns also in relation to traffic and transport and the 3 waterways that have to be crossed. 	<ul style="list-style-type: none"> • The Council is confident that exceptional circumstances for Green Belt release have been identified. Development capacity within the existing urban area has been considered in detail, and indeed the majority of development over the plan period will be directed here, however there is a need for some Green Belt release in order to meet the minimum residential and employment needs up to 2038 and beyond. • Extensive work has been carried out in relation to the natural and historic environment with further detailed work to be undertaken to inform the proposed Development Framework. The Council acknowledges the presence of a significant amount of existing green infrastructure in the area, such as the Mersey Valley Timberland Trail, and there is no reason why this cannot continue to be provided within the SEWUE. • The updated PSVLP closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South West Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport. • Concerns regarding the canal crossings are acknowledged and the policy makes provision for contributions towards enhancements.
<ul style="list-style-type: none"> • Lymm Neighbourhood Plan Group – Exceptional circumstances have not been demonstrated for this significant area of Green Belt release. The plan must include provision for the replacement/improvement of Ship Canal crossings. 	<ul style="list-style-type: none"> • The Council is confident that exceptional circumstances for Green Belt release have been identified for Warrington as a whole and for each of the allocation sites, including the South East Warrington Urban Extension, which will ensure that a major proportion of Warrington’s need for housing can be met sustainably through comprehensive planning and infrastructure delivery. The scale of the urban extension will also provide capacity for growth well beyond the Plan period, ensuring the permanence of the revised Green Belt boundaries.

Policy MD2 – South East Warrington Urban Extension	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • . Development capacity within the existing urban area has been considered in detail, and indeed the majority of development over the plan period will be directed here, however there is a need for some Green Belt release in order to meet the minimum residential and employment needs up to 2038. • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. This is identified in Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough. • Whilst specific details for a crossing over the Bridgewater Canal have not yet been identified, Policy MD2 requires that contributions are made towards this so that it can be utilised when the Council is in a position to take this forward. This position will continue to be monitored.
<ul style="list-style-type: none"> • Trams for Warrington – concerns about congestion in south Warrington and poor public transport provision. The proposed improvements to the Cat & Lion junction will create more problems and the relief road should be connected directly to J10/M56 roundabout. Concerns about stopping up of Stretton Road and the impact this will have on local residents. Concerns also regarding traffic on Stockton Lane, Knutsford Road and in Stockton Heath more generally. 	<ul style="list-style-type: none"> • The updated PSVLP closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South West Warrington Urban Extension, and other allocations in the Plan are able to be well served by public transport. • The allocation policy for the South East Warrington Urban Extension in the Updated PSVLP (2021) includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. • LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes. • As assessment of the options available to improve the Cat & Lion junction has been made and it is considered that there are a number of potential

Policy MD2 – South East Warrington Urban Extension	
Summary of Issues Raised	Response
	alignments within land controlled by developers which will allow an appropriate connection on to the A49 and wider strategic highway network. The exact form and location will be examined through the Development Framework process.
<ul style="list-style-type: none"> Manchester Airport Group – Wish to be kept informed as the development framework for the site is progressed. 	<ul style="list-style-type: none"> Comments noted.
<ul style="list-style-type: none"> Cheshire Wildlife Trust - concerns that the allocation incorporates Grappenhall Heys Local Wildlife Site (parts 1 and 2) and the Dingle and Fords Rough LWS/Ancient woodland. Both of these sites contain priority habitats and support priority species and both sites must be excluded from the allocations in order to comply with the emerging Warrington policies and the NPPF. 	<ul style="list-style-type: none"> Grappenhall Heys Local Wildlife site Part 1 falls within the allocation boundary of the South East Warrington Urban Extension, however this has been identified as green Infrastructure on the Policies Map and will be protected under the provisions of Policy MD2 and the forthcoming Development Framework. Part 2 falls outside of the allocation boundary. A small area of the Dingle and Fords Rough LWS also falls within the allocation boundary – again this will be protected as green infrastructure, as identified on the Policies Map.
<ul style="list-style-type: none"> Woodland Trust: The Trust is concerned about site allocation MD2 as it could lead to the damage and loss of ancient woodland and therefore objects to this allocation. Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The size of site allocation MD2 suggests that large scale development could potentially take place. The minimum 15m buffer recommendation to all development is not effective in ensuring that ancient woodland within and/or adjacent is not affected by potential future development. In this instance we would recommend buffering of 50m. 	<ul style="list-style-type: none"> Policy MD2 seeks to incorporate areas of existing green infrastructure, including areas of ancient woodland, into the overall allocation. Such areas will continue to be protected under the provisions of Policy MD2 and through the forthcoming Development Framework. Comments regarding the buffer to ancient woodland are noted. The Council considers that Policy MD2 is sound as drafted and that further details in this regard can be addressed through the Development Framework.

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Pleased to see Fiddlers Ferry site included in the plan. 	<ul style="list-style-type: none"> • Support for allocation of the site noted.
<ul style="list-style-type: none"> • Multi-user routes should be considered around this site, including for horses. 	<ul style="list-style-type: none"> • The need for multi-user routes is noted and can be picked up post adoption of the plan when the detail is worked up for development of the site through the preparation of a development framework.
<ul style="list-style-type: none"> • More housing should be included on such a large site to reduce the strain in Green Belt. 	<ul style="list-style-type: none"> • The amount and type of development proposed at Fiddlers Ferry is considered appropriate in terms of nature and scale. The future use of the existing power station site has been considered in detail, including the potential use of the brownfield part of the site for residential development. It is the intention of the site owners SSE to keep land occupied by the existing power station in employment use. This view takes account of remediation considerations as well as the owner's future aspirations for the site. The Council also wishes to see the brownfield part of the site retained for employment uses in order that it can contribute to the Borough's employment land requirements. In order to facilitate the clear up of the site for more modern employment uses, it is proposed that there will be an element of Green Belt release adjacent to the site for residential development. Indeed this reduces the impact of Green Belt release elsewhere in the Borough for both employment and residential uses.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The whole Fiddlers Ferry site should be considered for housing development rather than employment due to the potential for a tram or rail link. 	<ul style="list-style-type: none"> • The amount and type of development proposed at Fiddlers Ferry is considered appropriate in terms of nature and scale. The future use of the existing power station site has been considered in detail, including the potential use of the brownfield part of the site for residential development. It is the intention of the site owners SSE to keep land occupied by the existing power station in employment use. This view takes account of remediation considerations as well as the owner's future aspirations for the site. The Council also wishes to see the brownfield part of the site retained for employment uses in order that it

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
	<p>can contribute to the Borough’s employment land requirements. In order to facilitate the clear up of the site for more modern employment uses, it is proposed that there will be an element of Green Belt release adjacent to the site for residential development. Indeed this reduces the impact of Green Belt release elsewhere in the Borough for both employment and residential uses.</p>
<ul style="list-style-type: none"> • Infrastructure for Fiddlers Ferry has not been adequately addressed, particularly traffic and transport issues. 	<ul style="list-style-type: none"> • The Council is confident that the implications of the level of development proposed have been fully considered in terms of infrastructure. In particular the impact of development on traffic and transport issues have been carefully considered with WBC Transportation colleagues, officers from Halton Borough Council and National Highways who have concluded that, with improvements to the existing network, the proposed development can be accommodated. There will of course be further work carried out in this regard at development framework and planning application stages. The Council is confident that draft Policy MD3 sets out sufficient and appropriate requirements for this to be fully addressed in due course.
<ul style="list-style-type: none"> • The proposed site allocation at Fiddlers Ferry is not visionary enough. Use of the railway should be included and land between the site and west Warrington should be included for development. 	<ul style="list-style-type: none"> • The use of the railway is not in the control of the site owners, however any potential to link to the future use of the railway in this location will continue to be monitored. • It is the Council’s view that development of the land referred to would result in the coalescence of the urban areas of Warrington and Widnes in the adjoining borough of Halton. With the proposed release of Green Belt adjacent to Fiddlers Ferry, the area of Green Belt land between the Fiddlers Ferry site and west Warrington will be of increased importance in maintaining the gap between these two urban areas and should be maintained to ensure the overall function and integrity of the Warrington Green Belt. The Council has no intention to allocate the area of land referred to for development and there are considered to be more appropriate areas for development elsewhere in the Borough.

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Support for the assessment of impacts on Mersey Estuary SPA and welcome additional green space for the area. 	<ul style="list-style-type: none"> • The Council is committed to fully assessing the impact of proposed development at Fiddlers Ferry on protected sites as well as the surrounding environment more generally. Assessment of the impacts of development on the Mersey Estuary SPA will continue with increasing specificity as the development proposals progress. The Council considers that those parts of the site which are proposed to remain in the Green Belt but which are to be made accessible to the public, including much of the area currently occupied by lagoons used for cooling, will be of much recreational value to residents in areas surrounding the site.
Landowner/Developer	
<ul style="list-style-type: none"> • The allocation of the Fiddlers Ferry site is supported by site's owners who are promoting the development of the site and some other landowners / developers. 	<ul style="list-style-type: none"> • Support noted. In line with the Council's spatial strategy, it is fundamental that this brownfield site is allocated for development within the emerging plan.
<ul style="list-style-type: none"> • There is insufficient evidence available to conclude that the development of the site will not cause harm to a European protected ecological site (Mersey Estuary) as identified by the HRA. 	<ul style="list-style-type: none"> • It is considered that the HRA has adequately assessed the impact of the proposed allocation on the Mersey Estuary SPA. The HRA of the Local Plan has assessed the policy and allocation in broad terms (i.e. the principle of development on this site for 101ha of employment land, a minimum of 1,760 new homes and community facilities), rather than the details of any particular masterplan, vision, or developer aspirations. The assessment carried out has to be proportionate to the stage of the plan or proposal at the time. Adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure. • The site allocation policy (MD3) requires a project specific HRA to be undertaken if habitats within the allocation site or on adjacent land are found to support significant populations of qualifying species of wintering birds.

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • There is insufficient evidence available to demonstrate that site specific exceptional circumstances exist to release the land from the Green Belt for residential development. 	<ul style="list-style-type: none"> • The site owners have produced a considerable amount of evidence to support their case for redevelopment of the power station site. A key factor in keeping this substantial employment site in active use is the cost of remediation of the brownfield land to enable its re-use for cleaner, more modern employment uses which is important in the context of the Borough’s employment land needs over the plan period. The release of Green Belt land for residential development enables the remediation of the power station site whilst also creating a sustainable mixed use community located in this part of the Borough. For these reasons, and as documented in the evidence base, the Council considers that exceptional circumstances do exist to remove land from the Green Belt in this location.
<ul style="list-style-type: none"> • The development of the site would have significant adverse impacts on the role and purpose of the Green Belt and undermine its permanence in this particular location whilst also eroding the strategic gap between Warrington and Widnes. 	<ul style="list-style-type: none"> • The Green Belt Assessment Report for Fiddlers Ferry (April 2021) acknowledges that development of the site would result in some encroachment into the countryside however development would not represent unrestricted sprawl as it is not adjacent to the Warrington urban area. It is recognised that development would reduce the separation between the Warrington urban area, Widnes and Runcorn. The remaining gap between the towns would be at its narrowest point however a degree of separation would be maintained by the land to the east of Marsh Lane, and the land beyond the southern tip of the site, as well as by the physical constraints of the River Mersey and the Manchester Ship Canal. Overall development would not result in neighbouring towns merging. The assessment concludes that the removal of the site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt however it is likely to result in localised harm to the Green Belt in this location. The Council is therefore of the view that the impact of Green Belt release in this location is minimal and appropriate measures can be put in place to strengthen revised boundaries to ensure their permanence in the future.

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The residential allocations are isolated from the main urban area of Warrington and its associated services and the existing outlying villages within the Borough. The residential allocations would also be isolated from existing residential areas and services within Halton Borough Council. 	<ul style="list-style-type: none"> • Access to services has been an important consideration when assessing the Fiddlers Ferry site in terms of its future use and therefore its draft allocation in the plan. Officers have had detailed conversations with service providers across Warrington and Halton. As a result of these discussions, the Council is satisfied that the needs arising from the proposed development at Fiddlers Ferry can be met. Where needs have been identified, Draft Policy MD3 seeks to provide infrastructure within the site itself in the form of a new primary school, health facility and local centre. Other social infrastructure such as secondary schools and leisure facilities within the existing urban of Warrington and Widnes can be readily accessed from the site and access will be enhanced through active travel and public transport improvements.
<ul style="list-style-type: none"> • There is no correspondence from Halton Council confirming the proposed policy would not adversely impact on services, facilities and infrastructure with their Borough boundary. 	<ul style="list-style-type: none"> • The Council continues to have ongoing dialogue and has held Duty-to-Co-operate meetings with officers at Halton Borough Council. No concerns have been raised by Halton during these discussions and the allocation policy enables enhancement of facilities in Halton if required. It is anticipated that a Statement of Common Ground will be signed by both parties prior to submission of the plan for independent examination.
<ul style="list-style-type: none"> • There is insufficient evidence that the southern proposed residential area could be developed noting its current use for ash deposits, it being surrounded by a flood risk area and its sensitive ecological attributes. 	<ul style="list-style-type: none"> • The site owners have produced a considerable amount of evidence to support their case for redevelopment of the power station site. This includes a vast amount of technical information as to how the lagoons to the south of the power station, including the ash deposits, can be utilised going forward. That part of the site to the south of the railway line which is proposed for residential use is significantly higher than the River Mersey and is not at any risk of flooding. Despite the fact that the lagoons are man-made and were created for the purposes of cooling as part of the power station process, they have indeed developed their own ecological value. This has been considered within the site wide proposals, within which the lagoons will be retained, their ecological

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
	value enhanced and also be opened up for recreational use as appropriate.
<ul style="list-style-type: none"> • The allocation should be removed in its entirety due to development and viability constraints. 	<ul style="list-style-type: none"> • The site owners have reassured the Council that the proposals are viable and deliverable. This has been confirmed by the Council’s own plan-wide viability assessment. The Council has also prepared an addendum to the Local Plan viability assessment to respond to issues raised during the consultation and the Council is satisfied the allocation is viable and deliverable. The Council therefore remains committed to the delivery of the Fiddlers Ferry allocation site through the Local Plan.
<ul style="list-style-type: none"> • Development within the plan period is overly ambitious. Anticipated delivery is wildly optimistic, very unlikely many dwellings will be delivered even in Years 6 -10. 	<ul style="list-style-type: none"> • The site owners have drawn on their experience of remediation of such sites elsewhere in the UK and they and the Council are confident that the timescales are realistic for the type of development proposed. Indeed the residential elements of the proposals are on greenfield land which does not require remediation before development.
<ul style="list-style-type: none"> • There are significant omissions in the evidence as to the deliverability of the site. More technical work needed. 	<ul style="list-style-type: none"> • The site owners have produced a considerable amount of evidence to support their case for redevelopment of the power station site. The Council is confident that this evidence supports the allocation of the site for the development proposed in the draft plan. In addition, the Council’s own assessment of viability of development in this location indicates that the proposed development is indeed deliverable.
<ul style="list-style-type: none"> • Unclear what demand there is for B2 and B8 uses in this location. 	<ul style="list-style-type: none"> • Both the Council and the site owners are confident that there is demand for B2 and B8 uses at the Fiddlers Ferry site. Whilst not located immediately adjacent to the motorway network, the site has good links to the M56 via A562 and A557 and the Mersey Gateway crossing and also eastward towards the M62. The Council is relying upon this allocation as an important element of its employment land supply during the plan period and its suitability for such uses has been confirmed through the Council’s own assessment, through production of the EDNA, as well as detailed work carried out by the site owner SSE.

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Concerns over the timescales for delivery taking account of the works required to remediate the site. 	<ul style="list-style-type: none"> The site owners have drawn on their experience of remediation of such sites elsewhere in the UK and they are confident that the timescales are realistic for the type of development proposed.
<ul style="list-style-type: none"> The Council needs to demonstrate it has had regard to adjoining land uses and in particular the location of the adjacent COMAH designation and build in specific policy provisions in this regard. 	<ul style="list-style-type: none"> The Council has taken into account all COMAH designations in its site assessment process and in preparing Policy MD3. The Council considers that specific reference to the COMAH site is not required within the policy wording.
Statutory Consultees	
<ul style="list-style-type: none"> Historic England - supports the proposed policy and associated heritage impact assessment. The policy ensures that any proposals will be required to preserve and enhance the historic environment. 	<ul style="list-style-type: none"> Support noted. The Council has considered impacts on heritage assets and will continue to do so as proposals for the site are worked up in more detail.
<ul style="list-style-type: none"> National Grid - Development will be required to provide a strategy for responding to the National Grid overhead transmission lines present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design. 	<ul style="list-style-type: none"> Comments noted. The Council will continue to consult with National Grid as the detail of the development is worked up through the development framework in order to meet all necessary requirements.
<ul style="list-style-type: none"> United Utilities - propose additional text under Utilities and Environmental Protection. 	<ul style="list-style-type: none"> Additional comments noted. The Council is confident that the key areas of concern are dealt with appropriately in the policy and any additional detail can be addressed through the preparation of the development framework.
<ul style="list-style-type: none"> Cheshire Constabulary - The impact of this development on the police or other emergency services is not recognised, unlike all other infrastructure requirements. 	<ul style="list-style-type: none"> The Council is confident the allocation can be developed in such a way that access can be provided for emergency vehicles. The Council will consider any other requirements relating to emergency services through the development framework and/or a future planning application.
<ul style="list-style-type: none"> Sport England: MD3.1 involves the loss of a playing field, this should be protected or replaced as part of the development along with that necessary to meet the demands of the development in accordance with Sport England policy and NPPF. 	<ul style="list-style-type: none"> Policy MD3 at point 20 sets out the requirements for sports pitch provision and this will be further considered through the Development Framework for the whole site.
Other	

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Cheshire Wildlife Trust - Local Wildlife Sites (site incorporates part of the Upper Mersey Estuary LWS and the St Helens Canal (disused) LWS) should be excluded from the allocation site and a sufficient buffer put in place. 	<ul style="list-style-type: none"> The site allocation boundary covers a large area of land which is not all proposed for development, indeed part of the allocation site will remain in the Green Belt. It is considered that existing local wildlife sites can be adequately protected and this detail can be worked through during preparation of the development framework.
<ul style="list-style-type: none"> Cheshire Wildlife Trust - Concerns about the impact on the ecological value and integrity of the Mersey Estuary SPA. 	<ul style="list-style-type: none"> It is considered that the HRA has adequately assessed the impact of the proposed allocation on the Mersey Estuary SPA. The HRA of the Local Plan has assessed the policy and allocation in broad terms (i.e. the principle of development on this site for 101ha of employment land, a minimum of 1,760 new homes and community facilities), rather than the details of any particular masterplan, vision, or developer aspirations. The assessment carried out has to be proportionate to the stage of the plan or proposal at the time. Adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure. The site allocation policy (MD3) requires a project specific HRA to be undertaken if habitats within the allocation site or on adjacent land are found to support significant populations of qualifying species of wintering birds.
<ul style="list-style-type: none"> Trams for Warrington - Welcome the redevelopment of Fiddlers Ferry site and the re-use of brownfield land as a means of avoiding more Green Belt release. However the proposals are not visionary enough – the use of the railway should be integrated to the development. In addition, the proposals open up a swathe of land between the Fiddlers Ferry site and the area in West Warrington around Farnworth Road. This is an opportunity that could be pursued in the plan. 	<ul style="list-style-type: none"> Support for the proposed site allocation noted. The use of the railway is not in the control of the site owners, however any potential to link to the future use of the railway in this location will continue to be monitored. It is the Council's view that development of the land referred to would result in the coalescence of the urban areas of Warrington and Widnes in the adjoining borough of Halton. With the proposed release of Green Belt adjacent to Fiddlers Ferry, the area of Green Belt land between the Fiddlers Ferry site and west Warrington will be of increased importance

Policy MD3 – Fiddlers Ferry	
Summary of Issues Raised	Response
	in maintaining the gap between these two urban areas and should be maintained to ensure the overall function and integrity of the Warrington Green Belt. The Council has no intention to allocate the area of land referred to for development and there are considered to be more appropriate areas for development elsewhere in the Borough.
<ul style="list-style-type: none"> • Trans Pennine Trail Partnership – The Trans Pennine Trail should be added to the list of consultees when plans for Fiddlers Ferry are released for consultation. 	<ul style="list-style-type: none"> • Comments noted.

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Green Belt land used unnecessarily - brownfield regeneration should be prioritised. 	<ul style="list-style-type: none"> • The Peel Hall site is not designated as Green Belt. It is a large Greenfield strategic site within the existing urban area of the Borough. Through its Strategic Housing Land Availability Assessment (SHLAA) and Brownfield Register, the Council is confident it has identified all developable brownfield sites in the Borough.
<ul style="list-style-type: none"> • Development in the area will add to the existing congestion and pollution levels and will impact on the already over stretched infrastructure. 	<ul style="list-style-type: none"> • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site. This is subject to a number of planning conditions and the requirements of a S106 agreement which requires measures to mitigate impacts on the transport network and in respect of wider social infrastructure.
<ul style="list-style-type: none"> • If Peel Hall had not been in the Local Plan the developer would have no grounds for any appeal. 	<ul style="list-style-type: none"> • Whilst the 'weight' to be given to policies in an emerging Local Plan is a consideration for the decision maker at appeal, it is not correct to suggest that there would be no grounds for appeal if Peel Hall had not been included in the Regulation 19 Draft Local Plan. It should be noted that the housing target from the Council's adopted Local Plan was quashed in 2015 and the Council is not currently able to demonstrate a 5 year housing land supply. As such, the presumption of sustainable development as set out in the Government's National Planning Policy Framework applies in Warrington.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The development of Peel Hall should be resisted by the Council and failure to protect it is disastrous. 	<ul style="list-style-type: none"> • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning for the development of the site, subject to a number of planning conditions.
<ul style="list-style-type: none"> • Object to the inclusion of Peel Hall as it will be a loss of a large greenspace, increase congestion and air pollution levels and impacts on the lives of nearby residents. 	<ul style="list-style-type: none"> • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site. This is subject to a number of planning conditions and the requirements of a S106 agreement which

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
	requires measures to mitigate impacts on the transport network and in respect of wider social infrastructure.
Landowner/Developer	
<ul style="list-style-type: none"> A number of developers don't agree that the site will deliver 1,200 homes within the Plan Period given the long lead in time, with the need for the disposal of the site and for reserved matters applications, and a lack of evidence to support the assumed build rate. 	<ul style="list-style-type: none"> Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of planning conditions. One of those condition was for a sustainable community not exceeding 1,200 new homes. This figure is based on SHLAA density assumptions and together with the Council's assessment of the lead in time and build rate for the development, has been used in the Council's housing land supply calculation and is considered an achievable figure.
<ul style="list-style-type: none"> Site owner of Mill Lane playing fields supports the allocation of the playing fields and the provision of replacement sports pitches, but raises concern about duplication of the requirement for measurable Biodiversity Net Gain under policies DC3 and DC5. 	<ul style="list-style-type: none"> Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of planning conditions. Therefore, in line with the conditions set out in APP/M0655/W/17/3178530RD, the Inspector might be minded to suggest modifications to the current policy/policies as written to reflect the appeal decision.
<ul style="list-style-type: none"> The site owner promoting the allocation notes that Planning Permission for this site was granted at appeal on 9/11/21 for its development in form similar to the proposed allocation. As such the plan should be amended to notate the site as a commitment rather than an allocation and the Policy thus deleted. If, for whatever reason the proposed allocation remains relevant, then a number of amendments are required to ensure consistency with the Secretary of State's decision and therefore make the Plan sound. 	<ul style="list-style-type: none"> Despite the site now having outline consent, the Council considers it is essential that the allocation policy remains in the Plan as the basis to assess future reserved matters applications for the site and / or any renewal of planning permission. However, in line with the conditions set out in APP/M0655/W/17/3178530RD, the Inspector might be minded to suggest modifications to the current policy as written to reflect the appeal decision.
<ul style="list-style-type: none"> The site owner promoting the allocation is concerned that the housing trajectory does not anticipate housing delivery on this site within the first 5 years of the Plan. Peel Hall is the most investigated and worked up of 	<ul style="list-style-type: none"> Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
<p>the development allocations in the Local Plan. Therefore, completion of homes in the first 5 years of the Plan period should be included in the trajectory. Further, the use of ‘up to 1200 new homes’ in policy is negative and places an artificial ceiling on the capacity of the site and the policy should be amended to refer to a ‘minimum’.</p>	<p>planning conditions. One of those condition was for a sustainable community not exceeding 1,200 new homes. This figure is consistent with the Council’s SHLAA density assumptions.</p> <ul style="list-style-type: none"> • Whilst the Council is confident the site will be developed within the Plan Period, the site is not included within the Plan’s 5 year housing land supply given the lead in time for the site, with the need for disposal of the site and reserved matters applications.
Statutory Consultees	
<ul style="list-style-type: none"> • Highways England: The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered, and that an area-wide Travel Plan is implemented on the site. 	<ul style="list-style-type: none"> • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of planning conditions. Therefore, in line with the conditions set out in APP/M0655/W/17/3178530RD, the Inspector might be minded to suggest modifications to the current policy as written to reflect the appeal decision.
<ul style="list-style-type: none"> • Cheshire Police & Crime Commissionaire: The impact of this allocation upon the Police and other emergency services is not recognised. This is in contrast to other site specific requirements for all other infrastructure and service providers e.g., health, education, utilities and so on. Request amendments to policy to recognise Police infrastructure in line with the requirements of national policy requirements. 	<ul style="list-style-type: none"> • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of planning conditions. Therefore, in line with the conditions set out in APP/M0655/W/17/3178530RD, the Inspector might be minded to suggest modifications to the current policy as written to reflect the appeal decision.
<ul style="list-style-type: none"> • United Utilities: Request various amendments to policy wording for the avoidance of doubt and to bring this policy in line with the requirements of other site allocation policies. 	<ul style="list-style-type: none"> • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of planning conditions. Therefore, in line with the conditions set out in APP/M0655/W/17/3178530RD, the Inspector might be minded to suggest modifications to the current policy as written to reflect the appeal decision.
Other	

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Peel Hall Rule 6 Party: WBC's Statement of Community Involvement (SCI) at par.2.9 states that: The Council will give notice of the intention to commence work on the preparation of an update to its Local Plan or a more detailed Local Plan document as soon as it is clear as to its scope, purpose and timetable. At this point the Council will also invite consultees to make representations about the proposed content of the Local Plan Document. This will be done by direct notification of all consultees listed in the SCI. • The Rule 6 Party spent over 12 months alongside WBC representatives at the Peel Hall planning inquiry and yet there was absolutely no attempt by WBC to involve the Rule 6 Party as a consultee in the period before the revised Local Plan was released for public scrutiny. • There is overwhelming opposition to Peel Hall and it should be removed from the Local Plan. It is objected to by an overwhelming majority of local people, principally because we can see that the Plan is not achievable without damaging local communities. Development at Peel Hall would impact upon local communities, with damage being caused by increased traffic, increased flood risk and increased ill-health caused by poor air quality. 	<ul style="list-style-type: none"> • Par. 2.9 of the Council's SCI relates to the Regulation 18 Local Plan Contents and Scope stage of Local Plan preparation, and not the Regulation 19 Draft Local Plan stage. At the Regulation 18 stage of preparation in 2016 the Council consulted in line with the requirements of its SCI, as it did throughout both stages of the Regulation 19 Draft Local Plan stage. • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of planning conditions. Therefore, in line with the conditions set out in APP/M0655/W/17/3178530RD, the Inspector might be minded to suggest modifications to the current policy/policies as written to reflect the appeal decision.
<ul style="list-style-type: none"> • Our Green Warrington: This open space should be permanently protected for the community as it offers accessible countryside, a rare commodity in north Warrington and provides an important buffer from the Motorway 	<ul style="list-style-type: none"> • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of planning conditions.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust: Site incorporates Radley plantation and pond, a LWS and must be excluded from the allocation to comply with policies DC3 & DC4 and the NPPF. There will also be a need in line with the requirements of the NPPF to mitigate the impacts on important species. 	<ul style="list-style-type: none"> • Since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning permission for the development of the site, subject to a number of planning conditions. Therefore, in line with the conditions set out in APP/M0655/W/17/3178530RD, the Inspector might be minded to suggest modifications to the current policy as written to reflect the appeal decision.

Policy MD4 - Land at Peel Hall	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Woodland Trust: The Trust is concerned about site allocation MD4 as it could lead to the damage and loss of ancient woodland and therefore objects to this allocation. Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. • The size of site allocation MD4 suggests that large scale development could potentially take place. The minimum 15m buffer recommendation to all development is not effective in ensuring that ancient woodland within and/or adjacent is not affected by potential future development. In this instance we would recommend buffering of 50m. 	<ul style="list-style-type: none"> • Comments noted, however; since the publication of and during the consultation period on the UPSVLP (2021), the Secretary of State has granted outline planning for the development of the site, subject to a number of planning conditions.

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Exceptional circumstances have not been demonstrated to justify the release of this site from the Green Belt and there are concerns about the impact on remaining Green Belt in this area. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington’s development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’. • The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including Thelwall Heys, which will provide much needed homes in a sustainable location early in the Plan period and without having a material impact on the functioning of Warrington’s Green Belt in this area. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the site currently makes a weak contribution to Green Belt purposes. The removal of this site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the south, east and north by the Bridgewater Canal, Cliff Lane, All Saints Drive, and the Trans Pennine Trail respectively. • The Policy also has a specific requirement for development to provide a scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt.

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The plan fails to respond to climate change - increasing housing on this scale will increase pollution. 	<ul style="list-style-type: none"> • In line with the requirements of the NPPF the updated Plan is supporting a transition to a low carbon future in a changing climate. The allocation contains specific measures to reduce car dependency, support public transport, cycling and walking and increase the energy efficiency of new homes in the development.
<ul style="list-style-type: none"> • Number of new homes to be built is higher than recent growth estimates for the town predict are necessary. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the higher housing target in the previous PSVLP 2019. The Council is not proposing an additional uplift to the housing requirement, as was the case with the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID.
<ul style="list-style-type: none"> • The proposed plans will create traffic issues as existing road infrastructure is insufficient and the development will result in dangerous access and egress from Cliff Lane to the A50 and A56. 	<ul style="list-style-type: none"> • The policy requires a package of Transport improvements to support the development. This includes ensuring appropriate access arrangement, provision of walking and cycling routes and other network improvements or travel plan measures identified through an appropriate Transport Assessment.
<ul style="list-style-type: none"> • More Traffic will lead to more air pollution. 	<ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised.

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the UPSVLP (2021) is proposing a lower level of development. The existing report is therefore considered to assess a ‘worst case’ scenario. Updated air quality modelling has however informed the updated Habitats Regulation Assessment • The policy for Thelwall Heys includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality.
<ul style="list-style-type: none"> • There are no special circumstances for the release of what is Greenbelt land and this land was designated in 2006 and not allocated in the previous draft versions of the PSVLP. 	<ul style="list-style-type: none"> • The Council has demonstrated through the update of its Strategic Housing Land Availability Assessment (SHLAA) that there are insufficient non-Green Belt sites to accommodate Warrington’s future development needs and is only proposing Green Belt release having exhausted all other options. The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. Land at Thelwall Heys will provide much needed homes in a sustainable location early in the Plan period and without having a material impact on the functioning of Warrington’s Green Belt in this area.
<ul style="list-style-type: none"> • Fiddlers Ferry is a brownfield site that should be in the plan and Peel Hall has become available. This will reduce the housing target by 1200. 	<ul style="list-style-type: none"> • Both sites are allocated in the Updated PSVLP (2021) and have been accounted for in the Plan’s housing land supply.
<ul style="list-style-type: none"> • The Greenbelt assessment is flawed. 	<ul style="list-style-type: none"> • 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 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.

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt Release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated ‘Proposed Submission Version Local Plan’. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries. • The Council are satisfied that these reports provide a robust assessment of the performance of Warrington’s Green Belt and the implications of releasing the proposed allocation sites, including Thelwall Heys.
<ul style="list-style-type: none"> • Concerns about the impact of proposals on the impact on wildlife, flora and fauna. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council has ensured that the allocation policy includes specific provision to protect ecology. Where there are impacts on important ecological assets, the Plan requires extensive mitigation to offset the loss of habitat and the allocation policy requires an overall net increase in biodiversity. In preparing the Plan, the Council has worked closely with statutory consultees including Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard.
<ul style="list-style-type: none"> • The land has Special Landscape Character Status and is high value agriculture land 	<ul style="list-style-type: none"> • It is acknowledged that the site is graded 2 and 3 in the Agricultural Land Classification. The quality of agricultural land was taken into account in the Council’s spatial option and site assessment processes and in the Plan’s Sustainability Appraisal. The Council has sought to minimise the loss of the best and most versatile agricultural land. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan’s objectives and SA/SEA site assessment criteria to establish that the sites were ‘suitable’. The agricultural quality of the land was just one the criteria that were used to assess the sites. Since the majority of the borough is covered by similar quality

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
	<p>agricultural land this has little impact on the overall assessment of sites. The amount of land to be removed from the Green Belt (and hence the amount of BMVAL to be lost) has significantly reduced in the Updated PSVLP (2021) compared to the previous PSVLP (2019). It is now only proposed to remove 5% of land from the Green Belt compared to 11% previously. The vast amount of agricultural land in the borough will be retained.</p> <ul style="list-style-type: none"> • The site has been assessed in terms of its Green Belt performance. The site’s landscape character has been taken into account in the site assessment process by reference to the Council’s Landscape Character Assessment. There is no designation in the current adopted Local Plan of special landscape status.
<ul style="list-style-type: none"> • The proposals will impact on the Trans Pennine Trail and the Bridgewater Canal 	<ul style="list-style-type: none"> • The policy specifically identifies the Bridgewater Canal and the Trans Pennine Trail recognising their importance and the need to protect and enhance their environmental setting and accessibility for residents.
<ul style="list-style-type: none"> • Area is currently enjoyed by residents and loss will impact on their health and well-being. 	<ul style="list-style-type: none"> • The policy requires a comprehensive green infrastructure strategy to ensure that there is provision of accessible and high quality multi-functional greenspaces. Enhancements and access to the Trans Pennine Trail and Bridgewater to Canal is also specified.
<ul style="list-style-type: none"> • There are no details with regard to additional canal crossings. 	<ul style="list-style-type: none"> • Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. This is identified in Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough.
<ul style="list-style-type: none"> • Lack of public transport in the area to support the development. 	<ul style="list-style-type: none"> • The allocation policy for Thelwall Heys includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. These improvements will be supported by a Travel Plan based on a full Transport Assessment.

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Brownfield sites should be used first before allowing Green Belt release and the Council has not maximised brownfield land release. 	<ul style="list-style-type: none"> • In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this was incorporated into the SHLAA. • Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • A number of brownfield sites in the Plan’s housing supply are not able to come forward until later in the Plan Period, due to issues including land assembly, land remediation and infrastructure constraints. As such, the Council is not able to sequence its land supply to only allow Green Belt development once all brownfield sites have been built out.
<ul style="list-style-type: none"> • The development will cause flooding in the area 	<ul style="list-style-type: none"> • The Council has undertaken a Strategic Flood Risk Assessment in considering potential development allocations in the updated PSVLP. The vast majority of the site is within Flood Zone 1. • The allocation policy requires a site-wide foul and surface water strategy incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures. The surface water strategy will be required to improve on greenfield run-off rates. • As such the Council is confident that there will not be increased flooding as a result of the proposed allocation.

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • No demand for new housing in this area. 	<ul style="list-style-type: none"> • The Council has established its housing requirement in accordance with the Government’s Planning Practice Guidance. The full analysis is provided in the Council’s updated Local Housing Needs Assessment (2021).
<ul style="list-style-type: none"> • Concern over the excessive amount of housing proposed in the plan. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the higher housing target in the previous PSVLP 2019.
<ul style="list-style-type: none"> • Not addressing the need for affordable housing and the focus on the employment at 656 will not provide suitable employment for local workers who can afford to purchase the expensive housing that is proposed. 	<ul style="list-style-type: none"> • The Thelwall Heys site will be required to provide 30% affordable housing. Of this two thirds will need to be affordable for rent, which will be for people on the Council’s housing waiting list. A third will be for low cost home ownership, of which the majority will be ‘First Homes’ specifically aimed at first time buyers. Given the relatively high value of houses in south Warrington, the Council will seek to apply a 40% discount from market value, as opposed to the standard 30% First Home Discount, to ensure these homes are genuinely affordable for first time buyers. With regard to rents the Policy includes a safeguard that rents should not exceed the Local Housing Allowance rates.
<ul style="list-style-type: none"> • Concerns about the provision of new schools, doctors and shops existing schools in the area. 	<ul style="list-style-type: none"> • The development will be expected to make a contribution towards primary and secondary school provision and to additional primary care capacity. There is also a requirement for a contribution to be made to expanding and enhancing existing or planned built leisure facilities and playing pitches.
<ul style="list-style-type: none"> • Concerns for the impact on the historic environment and no proper heritage assessment undertaken. 	<ul style="list-style-type: none"> • The Council has undertaken a Heritage Impact Assessment of the proposed Thelwall Heys allocation in consultation with Historic England. Development will be required to be designed in order to ensure that

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
	heritage assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to Heritage Impact Assessment.
<ul style="list-style-type: none"> • Thelway Heys Lane is used by horse and is not wide enough for 1 car. This will impact on the horses and a breeding program. 	<ul style="list-style-type: none"> • The policy requires a package of Transport improvements to support the development. This includes ensuring appropriate access arrangement, provision of walking and cycling routes and other network improvements or travel plan measures identified through an appropriate Transport Assessment.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • This area should stay in Green Belt. It was supported as Green Belt in previous plans 	<ul style="list-style-type: none"> • The Council has demonstrated through the update of its Strategic Housing Land Availability Assessment (SHLAA) that there are insufficient non-Green Belt sites to accommodate Warrington’s future development needs and is only proposing Green Belt release having exhausted all other options. • As part of the Council’s Local Plan evidence base, a full assessment of Warrington’s Green Belt was undertaken. This assessed sites against the 5 purposes of Green Belt as set out in National Planning Policy, to understand the function of all of the Borough’s Green Belt. The Green Belt Assessment has been one of the key factors that has informed the Plan’s spatial strategy and individual site allocations, including Thelwall Heys which was assessed as making a weak contribution to Green Belt purposes. • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. Land at Thelwall Heys will provide much needed homes in a sustainable location early in the Plan period and without having a material impact on the functioning of Warrington’s Green Belt in this area.

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The land is prone to flooding 	<ul style="list-style-type: none"> • The Council has undertaken a Strategic Flood Risk Assessment in considering potential development allocations in the updated PSVLP. • The allocation policy requires a site-wide foul and surface water strategy incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures. The surface water strategy will be required to improve on greenfield run-off rates.
<ul style="list-style-type: none"> • Area is currently enjoyed and valued by residents 	<ul style="list-style-type: none"> • The policy requires a comprehensive green infrastructure strategy to ensure that there is provision of accessible and high quality multi-functional greenspaces. Enhancements and access to the Trans Pennine Trail and Bridgewater to Canal is also specified.
<ul style="list-style-type: none"> • The proposals will impact on the Trans Pennine Trail and the Bridgewater Canal 	<ul style="list-style-type: none"> • The policy specifically identifies the Bridgewater Canal and the Trans Pennine Trail recognising their importance and the need to protect and enhance their environmental setting and accessibility for residents.
<ul style="list-style-type: none"> • Concerns for the impact on the historic environment and no proper heritage assessment undertaken. 	<ul style="list-style-type: none"> • The Council has undertaken a Heritage Impact Assessment of the proposed Thelwall Heys allocation in consultation with Historic England. Development will be required to be designed in order to ensure that heritage assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to Heritage Impact Assessment.
<ul style="list-style-type: none"> • Concerns about the scale of proposals on land which is currently open countryside and impact on wildlife, flora and fauna. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council has ensured that the allocation policy includes specific provision to protect ecology. Where there are impacts on important ecological assets, the Plan requires extensive mitigation to offset the loss of habitat and the allocation policy requires an overall net increase in biodiversity. In preparing the Plan, the Council has worked closely with statutory consultees including Natural England and the Environment Agency to ensure the potential impact of development has

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
	been appropriately assessed and that mitigation measures are to the required standard.
<ul style="list-style-type: none"> • The land is high quality agricultural land. 	<ul style="list-style-type: none"> • It is acknowledged that the site is graded 2 and 3 in the Agricultural Land Classification. The quality of agricultural land was taken into account in the Council’s spatial option and site assessment processes and in the Plan’s Sustainability Appraisal. The Council has sought to minimise the loss of the best and most versatile agricultural land. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan’s objectives and SA/SEA site assessment criteria to establish that the sites were ‘suitable’. The agricultural quality of the land was just one the criteria that were used to assess the sites. Since the majority of the borough is covered by similar quality agricultural land this has little impact on the overall assessment of sites. The amount of land to be removed from the Green Belt (and hence the amount of BMVAL to be lost) has significantly reduced in the Updated PSVLP (2021) compared to the previous PSVLP (2019). It is now only proposed to remove 5% of land from the Green Belt compared to 11% previously. The vast amount of agricultural land in the borough will be retained.
<ul style="list-style-type: none"> • The land was identified has having Special Landscape Status in 2004 	<ul style="list-style-type: none"> • The site has been assessed in terms of its Green Belt performance. The site’s landscape character has been taken into account in the site assessment process by reference to the Council’s Landscape Character Assessment. There is no designation in the current adopted Local Plan of special landscape status.
Landowner/Developer	
<ul style="list-style-type: none"> • The landowner promoting the site is supportive of the proposed allocation of the land for housing in the draft Local Plan. 	<ul style="list-style-type: none"> • Support noted
<ul style="list-style-type: none"> • Developers promoting alternative sites have raised concerns that the land was not previously proposed to be allocated in the 2017 and 2019 consultations on the draft Plan given that it was subject to an Appeal 	<ul style="list-style-type: none"> • As part of the Council’s Local Plan evidence base, a full assessment of Warrington’s Green Belt was undertaken. This assessed sites against the 5 purposes of Green Belt as set out in National Planning Policy, to

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
<p>decision in 2004 which rejected the sites use for housing. The 5 purposes of Green Belt are clear and nothing has changed with regard to this site.</p>	<p>understand the function of all of the Borough’s Green Belt. The Green Belt Assessment has been one of the key factors that has informed the Plan’s spatial strategy and individual site allocations, including Thelwall Heys which was assessed as making a weak contribution to Green Belt purposes.</p> <ul style="list-style-type: none"> • The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites. Land at Thelwall Heys will provide much needed homes in a sustainable location early in the Plan period and without having a material impact on the functioning of Warrington’s Green Belt in this area.
<ul style="list-style-type: none"> • Developers promoting alternative sites consider that heritage and ecology constraints means the site’s allocation is not justified and it should remain Green Belt 	<ul style="list-style-type: none"> • The Council has undertaken a Heritage Impact Assessment of the proposed Thelwall Heys allocation in consultation with Historic England. Development will be required to be designed in order to ensure that heritage assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to Heritage Impact Assessment. • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council has ensured that the allocation policy includes specific provision to protect ecology. Where there are impacts on important ecological assets, the Plan requires extensive mitigation to offset the loss of habitat and the allocation policy requires an overall net increase in biodiversity. In preparing the Plan, the Council has worked closely with statutory consultees including Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard.

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Developers promoting alternative sites believe there is limited technical evidence to test and demonstrate the deliverability of the site and that site represents the most sustainable options when considered against reasonable alternatives. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan’s objectives and SA/SEA site assessment criteria to establish that the suitability of sites. • The Council has also undertaken a detailed assessment of infrastructure required to deliver these allocations and assessed each of the allocations, including Thelwall Heys, through its Local Plan Viability Assessment.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England supports the inclusion of a Heritage Impact Assessment in the policy requirements. The proposed policy ensures that development will be required to preserve and enhance the historic environment. 	<ul style="list-style-type: none"> • The Council has engaged extensively with Historic England in relation to Thelwall and the support is welcomed.
<ul style="list-style-type: none"> • United Utilities Ltd (UU) have proposed additional text to ensure that their own assets within the site boundary can continue to be accessed and will be considered within the design of development plots. 	<ul style="list-style-type: none"> • The policy is already comprehensive and the Council considers that this additional text is not necessary as the existing UU assets will need to be factored in to development proposals in any case.
<ul style="list-style-type: none"> • Cheshire Constabulary – the impact of this site upon Police and other Emergency services is not recognised or accounted for. The needs of all other services/infrastructure is addressed in the policy and therefore it is requested that the policy be amended to address this additional specific need. 	<ul style="list-style-type: none"> • The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
<ul style="list-style-type: none"> • National Highways – raise no concerns with the allocation and note that it is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered, and that an area-wide Travel Plan is implemented on the site. 	<ul style="list-style-type: none"> • Comments noted. The Council has engaged extensively with National Highways and will continue to do so.
Other:	
<ul style="list-style-type: none"> • Trams for Warrington –infrastructure concerns as development at Thelwall Heys will decant traffic directly on to Cliff Lane. This particular proposed development will only have one entry in and out. It will create 	<ul style="list-style-type: none"> • The policy requires a package of Transport improvements to support the development. This includes ensuring appropriate access arrangement, provision of walking and cycling routes and other network improvements

Policy MD5 – Thelwall Heys	
Summary of Issues Raised	Response
a bottleneck from Cliff Lane and add further pressure to the A50, Knutsford Road.	or travel plan measures identified through an appropriate Transport Assessment.
<ul style="list-style-type: none"> • CWT recommend a minimum undeveloped buffer of 15m from the Bridgewater Canal as an important wildlife corridor (inside the allocation red line boundary) is secured in line with the standing advice provided by Natural England to ensure the allocation complies with WLP Policies DC3 and DC4 and NPPF (2021) Paragraphs 174d, 179a, 179b and 180a. 	<ul style="list-style-type: none"> • Comments are noted. A Green Infrastructure Strategy is required for the site and the Bridgewater Canal is identified as an area where environmental benefits of the area should be enhanced. All relevant Local and national policy requirements will be met on development of the site.

Policy MD6 – South East Warrington Employment Area	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Unable to comprehend how local jobs will be created in warehousing, especially given automation proposals within the industry. This model of development is not sustainable and does not add value for future generations of Warrington. 	<ul style="list-style-type: none"> • Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the Town Centre and Inner Warrington. Businesses will seek to grow their operations, generating needs for premises and land, for a range of reasons, many of which are unrelated to the number of people they employ and their jobs density.
<ul style="list-style-type: none"> • No justification for Green Belt release for this development. 	<ul style="list-style-type: none"> • The release of Green Belt land is necessary to meet the employment land needs of Warrington over the plan period up to 2038. The Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites including the South East Warrington Employment Area. It is considered that this allocation will make a significant and sustainable contribution towards meeting Warrington’s current and long term employment development needs.
<ul style="list-style-type: none"> • Development will increase congestion on local roads and motorways, increase air pollution and does not consider existing high congestion and pollution levels. 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development, whilst reducing congestion and air pollution. • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the

Policy MD6 – South East Warrington Employment Area	
Summary of Issues Raised	Response
	Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised.
<ul style="list-style-type: none"> • Unrealistic and not justified to use unprecedented supply of land at Omega to predict future economic land requirement, therefore MD6 is not justified. 	<ul style="list-style-type: none"> • The Council has undertaken a comprehensive review of its Economic Development Needs Assessment (EDNA 2021) using data which post-dates the EU Brexit referendum. The Council no longer considers the previous scale of jobs growth to be realistic. However, the Council is confident the amount of land being proposed for employment uses in the updated PSVLP 2021, based on past take up rates, is robust and in line with the updated EDNA (2021) recommendations. • The Council has assessed historic land take including and excluding Omega, given it accounts for a large proportion of recent land take and fulfils a strategic function. The Council considers that the land supply need taking into account Omega better reflects the full range of need the Borough will face over the next 18 years.
<ul style="list-style-type: none"> • Warehousing and logistics facilities will not fulfil demand for high paid/high skilled employment. Employment opportunities likely to be low paid/low skilled and workers are likely to commute from elsewhere. 	<ul style="list-style-type: none"> • Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the town centre and inner Warrington. • The Council considers that the Plan’s housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the Borough.
<ul style="list-style-type: none"> • Abundance of existing vacant office/warehouse space available. Empty employment sites should be utilised for housing to prevent Green Belt release. 	<ul style="list-style-type: none"> • As part of the Council’s EDNA (2021) the local market is assessed through a quantitative review of property enquiries, deals done and the local supply of vacant premises alongside up to date market intelligence derived from consultations with a range of developers, scheme managers and property agents. Through this process, the Council is confident it has fully explored and maximised the use of brownfield sites and vacant

Policy MD6 – South East Warrington Employment Area	
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	properties to meet its future employment land needs before resorting to the release of Green Belt land.
<ul style="list-style-type: none"> • Having a large employment area so far outside of Warrington makes active travel there difficult and workers will be reliant on cars. This will increase congestion and pollution and is contrary to climate change objectives. 	<ul style="list-style-type: none"> • The UPSVLP closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy. The Main Development Areas, including the South East Warrington Employment Area, and other allocations in the Plan include a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development and address climate change.
<ul style="list-style-type: none"> • Development in this location has been previously rejected by Government. 	<ul style="list-style-type: none"> • Part of the allocation has been the subject of a planning application appeal, with the appeal subsequently being rejected by the Government. However, the test for acceptable development in the Green Belt by way of a planning application is demonstrating that Very Special Circumstances exist to warrant the granting of planning permission. The test for removal of land from the Green Belt through the Local Plan process to meet identified development needs, is demonstrating that Exceptional Circumstances exist. • Having assessed Warrington’s future employment land needs, the Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. The Council has demonstrated that Exceptional Circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites including the South East Warrington Employment Area. It is considered that this allocation will make a

Policy MD6 – South East Warrington Employment Area	
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	significant and sustainable contribution towards meeting Warrington’s current and long term employment development needs.
<ul style="list-style-type: none"> • Development would impact on the character of villages. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. • The nearest and only village in proximity to the proposed allocation is Appleton Thorn to west of the allocation, located adjacent to an existing employment area. Given other intervening features such as the M6 and M56 Motorways, and a further existing employment area between the allocation and the existing village of Appleton Thorn, it is not considered that the proposed allocation will impact on the character of the nearest village.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • The allocation will result in more HGVs on the road, using the already overloaded Junction 20 of the M6 and creating more congestion and air pollution. There is no prospect of a rail link to the site to promote more sustainable modes of transport 	<ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development. • As part of the Plan making process, through the Duty to Cooperate requirement, the Council has engaged constantly and constructively with National Highways (formerly Highways England) to ensure any impact on the Strategic Road Network is identified and mitigation measure agreed. This has been formalised by National Highways and WBC being signatories to a Statement of Common Ground with regards to the Strategic Road Network. • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions

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	<p>outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised.</p>
<ul style="list-style-type: none"> • Development will compete with the Parkside development in St Helens. 	<ul style="list-style-type: none"> • Warrington and its neighbouring authorities are all part of the wider economic sub-region and as part of the Local Plan Duty to Co-operate process have a duty to plan for strategic cross boundary issues such as employment development in neighbouring Local Authorities. • WBC need to plan for their own economic development land needs, whilst considering and understanding how the sub-regional economy operates, and the Council's updated EDNA (2021) provides analysis of Warrington's wider economic geography.
<ul style="list-style-type: none"> • The land should remain as Green Belt but if released should be a Green Science Park. 	<ul style="list-style-type: none"> • Warrington is home to a wide range of businesses. These range from major national and multi-national companies who have located their logistics operations at Omega, the cluster of Nuclear technology businesses (the largest in the UK) and offices at Birchwood Park (a designated Enterprise Zone), through to a diverse range of businesses located across Warrington's many industrial estates, with the Town Centre also being a focus for office development. • The proposed allocations in the Plan are considered to best meet the identified employment needs as set out in the Council's Economic Development Needs Assessment 2021, completing Warrington's wider employment offer.
<ul style="list-style-type: none"> • Logistics jobs created would not be for local people and those who did take them won't be able to afford to live in the area and would have to commute in causing more traffic. 	<ul style="list-style-type: none"> • Whilst the largest employment allocations in the Plan are allocated for distribution and logistics, the Plan as a whole will support a wide range of new jobs, including those which will be created through the regeneration of the town centre and inner Warrington. • The Council considers that the Plan's housing requirement will ensure that issues of affordability are addressed and support the number of jobs

Policy MD6 – South East Warrington Employment Area	
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	that will be created over the Plan period. This will increase opportunities for people to live and work in the Borough.
<ul style="list-style-type: none"> • This site should not be released from the Green Belt as it makes a significant contribution to the Green Belt. 	<ul style="list-style-type: none"> • Having assessed Warrington’s future employment land needs, the Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. • The Council’s Green Belt Assessment concluded that at a General Area level, this area makes a weak contribution to Green Belt purposes. At parcel levels, the site makes strong, weak and moderate contributions to Green Belt purposes. • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. The relative performance of Green Belt land was considered as part of that process. It is considered that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington’s employment development needs as part of the Plan’s overall Spatial Strategy, whilst ensuring the long term integrity of Warrington’s Green Belt. The Council has demonstrated that Exceptional Circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites, including the South East Warrington Employment Area. It is considered that this allocation will make a significant and sustainable contribution towards meeting Warrington’s current and long term employment development needs. • The Council has also demonstrated that the allocation will not compromise the function of remaining Green Belt in south east Warrington in the ‘Implications of Green Belt Release’ Report (2021) prepared in support of the Updated PSVLP 2021.
<ul style="list-style-type: none"> • The building of a logistics centre is counter to the Council's climate change objectives. 	<ul style="list-style-type: none"> • The UPSVLP closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South East Warrington Employment Area, and other

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	<p>allocations in the Plan promote active transport and are well served by public transport.</p> <ul style="list-style-type: none"> • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development and address climate change.
Landowner/Developer	
<ul style="list-style-type: none"> • Developers promoting land within the former Garden Suburb allocation in the PSVLP 2019 consider that standing alone, the South East Warrington Employment Area is isolated and will fail to deliver suitable public transport links and other sustainable transport modes. It fails to deliver an east west/Howshoots link. This can be resolved by reinstating the former Garden Suburb allocation. 	<ul style="list-style-type: none"> • The UPSVLP closely reflects the Council’s Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan’s Spatial Strategy and that the Main Development Areas, including the South East Warrington Employment Area. • The allocation policy for the South East Warrington Employment Area in the UPSVLP includes a range of measures to promote active transport, including walking and cycling, and improvements to public transport serving the allocation and surrounding area. • The allocation policy identifies a series of highways improvements that are required to mitigate the impact of the development on the local and strategic road networks.
<ul style="list-style-type: none"> • The principal land owners promoting the allocation fully support the Council’s ambition to create a major new employment location at the South East Warrington Employment Area and considers that this proposal within the Draft Plan is soundly based as it is fully justified, effective, consistent with national policy and has been positively prepared 	<ul style="list-style-type: none"> • Support Noted.
<ul style="list-style-type: none"> • One of the principal landowners, whilst supporting the need for a comprehensive masterplan, stresses that the site is controlled and will be delivered by two parties. Although the site is a single allocation the policy needs to recognise that the two parcels are able to be delivered 	<ul style="list-style-type: none"> • Given the magnitude of the development proposed in this area and the required supporting infrastructure, it is considered that the allocation policy, as written, is essential, appropriate and robust to ensure policy principles are delivered in a timely manner across the whole site. In

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independently of each other and accommodate their own green infrastructure, utilities and transport requirements. The Policy does not recognise this and could therefore hinder the timely delivery of the development unnecessarily.	particular the Council considers that issues relating to access, transport improvements, green infrastructure and utilities need to be considered across the allocation as a whole through the preparation of a development framework.
<ul style="list-style-type: none"> • The promoter of land adjoining the north east of the allocation supports the strategic employment location and policy objectives, however considers it is illogical to exclude their site from the wider SEWEA allocation and to retain it as Green Belt. The Local Plan evidence base provides no explanation as to why this is the case. The site is available, not subject to constraints and would be deliverable in the first phase of development. 	<ul style="list-style-type: none"> • Comments duly noted. The Council considers the current policy and site boundary is sound. Nevertheless, the Council recognises that the Inspector through the EIP process, might be minded to suggest modifications to the current policy as written to reflect the comments made in relation to including this additional land with the allocation.
<ul style="list-style-type: none"> • Concerns have been raised over the deliverability of the site during the Plan period, particularly when taking account of the comments relating to the need for funding to facilitate improvements at junction 20 of the M6. It is considered unlikely that the full 137 hectares of employment land will come forward during the Plan and a trajectory setting out rates of delivery is therefore needed. 	<ul style="list-style-type: none"> • The Council is confident and considers that based on the representations received from the landowners as part of the UPSVLP consultation and the assessment of potential employment sites carried out in the Council's EDNA (2021), that the whole of the site allocation will be delivered within the Plan period. • There is no requirement in national planning policy for the Council to set out the rates of delivery in an employment land trajectory as part of the Local Plan process.
<ul style="list-style-type: none"> • The extent of the proposed removal of land at South East Warrington and its allocation for employment development conflicts with national planning guidance for Green Belts. The land does not relate to any existing settlement boundary and only has a slight relationship with a small area that lies outside of the existing Green Belt. As such the removal of the whole site from the green belt will conflict with the purposes of Green Belt. 	<ul style="list-style-type: none"> • The Council's Green Belt Assessment concluded that at a General Area level, this area makes a weak contribution to Green Belt purposes. At parcel levels, the site makes strong, weak and moderate contributions to Green Belt purposes. • However, the Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites.
Statutory Consultees	
<ul style="list-style-type: none"> • Historic England: Support the proposed policy and heritage impact assessment and the Plan can demonstrate that the site can be developed without harm to the historic environment. 	<ul style="list-style-type: none"> • Support noted.

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<ul style="list-style-type: none"> • Manchester Airport Group: Due to the proximity and potential relationship between Manchester Airport and the South East Warrington Employment Area, the delivery of this allocation is of high interest to us. Of most significance to us will be the potential impact on the strategic road network in the vicinity of Manchester Airport. We would therefore appreciate being consulted on the finer detail Development Framework. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • National Highways: The allocation is supported by policies which ensure that transport infrastructure identified by a Transport Assessment is delivered. The allocation identifies that no work can begin on this site until improvements have been made at Junction 20 of the M6. SRN improvements have been highlighted in the Infrastructure Delivery Plan. 	<ul style="list-style-type: none"> • Comments duly noted.
<ul style="list-style-type: none"> • Cheshire Police & Crime Commissionaire: The impact of this allocation upon the Police and other emergency services is not recognised. This is in contrast to other site specific requirements for all other infrastructure and service providers e.g., health, education, utilities and so on. Request amendments to policy to recognise Police infrastructure in line with the requirements of national policy requirements. 	<ul style="list-style-type: none"> • The Council will engage with the Cheshire Constabulary to consider their future needs and the list of matters referred to is caveated to note that the list is not exhaustive. The Council is not aware at the current time of any evidence to demonstrate that specific emergency services provision needs to be made through the Local Plan.
<ul style="list-style-type: none"> • CWac: Recognise the work that has been undertaken to date and the commitment to working with neighbouring authorities. However, still have some concerns relating to the proposed allocations at: MD6 South East Warrington Employment Area. 	<ul style="list-style-type: none"> • Comments duly noted and this will be addressed through a statement of Common Ground ahead of submission of the Local Plan.
Other	
<ul style="list-style-type: none"> • Rethinking South Warrington’s Future: The economic growth aspirations do not justify the loss of Green Belt for employment land. The choice to use this employment land for logistics, at a site which is not multi-modal, is unsound for environmental and highways reasons. 	<ul style="list-style-type: none"> • The release of Green Belt land is necessary to meet the employment land needs of Warrington over the plan period up to 2038. The Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites including the South East Warrington Employment Area. It is considered that this allocation will make a significant and sustainable

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Summary of Issues Raised	Response
	<p>contribution towards meeting Warrington’s current and long term employment development needs.</p> <ul style="list-style-type: none"> • In considering potential employment allocations, the Council has used detailed assessment criteria set out in the EDNA - to assess potential site allocations in the context of Warrington’s employment land needs – ; how potential allocations perform against the Local Plan objectives; and assessed sites through the Sustainability Appraisal process. As such the Council is confident it has appropriately considered and balanced a wide range of economic, social and environment factors in establishing the Plan’s allocations, including the SEWEA allocation. • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation measures and infrastructure improvements will be required to support the proposed levels of development.
<ul style="list-style-type: none"> • Stretton NDP: No justification for the removal of land from the Green Belt for employment use in South Warrington. Employment opportunities created by logistics are limited and it is highly likely employees will travel to work here from outside of the Borough. Traffic implications of the development have not been sufficiently considered. 	<ul style="list-style-type: none"> • The release of Green Belt land is necessary to meet the employment land needs of Warrington over the plan period up to 2038. The Council has fully explored and maximised the use of brownfield sites to meet these needs before resorting to the release of Green Belt land. The Council has demonstrated that exceptional circumstances exist for the principle of Green Belt release in Warrington and for each of the individual allocation sites including the South East Warrington Employment Area. It is considered that this allocation will make a significant and sustainable contribution towards meeting Warrington’s current and long term employment development needs.. • The Council has assessed the level of development proposed in the Updated PSVLP (2021) through the Warrington Multi-Modal Transport model. It is accepted that the level of development proposed cannot be accommodated by the current transport network, and that mitigation

Policy MD6 – South East Warrington Employment Area	
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	<p>measures and infrastructure improvements will be required to support the proposed levels of development.</p> <ul style="list-style-type: none"> • The allocation policy for the South East Warrington Employment Area in the UPSVLP includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. • The Council considers that the Plan’s housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the Borough.
<ul style="list-style-type: none"> • Our Green Warrington: Another distribution site in Warrington is not considered to be a sustainable source of future employment. It would lead to significant HGV traffic. Therefore propose that if an employment site is to be established in South East Warrington it would more sensible to invest in emerging areas that will be significant for the economy in twenty or thirty years’ time e.g. a nationally recognised science and technology corridor – offering jobs in science, research and development and green manufacturing. 	<ul style="list-style-type: none"> • Warrington is home to a wide range of businesses. These range from major national and multi-national companies who have located their logistics operations at Omega, the cluster of Nuclear technology businesses (the largest in the UK) and offices at Birchwood Park (a designated Enterprise Zone), through to a diverse range of businesses located across Warrington’s many industrial estates, with the Town Centre also being a focus for office development. • The proposed allocations in the Plan are considered to best meet the identified employment needs as set out in the Council’s Economic Development Needs Assessment 2021, completing Warrington’s wider employment offer.
<ul style="list-style-type: none"> • Lymm NP Group: The proposed South East Warrington Employment area offers poor ‘value’ in terms of employment return against Greenbelt land released. The description provided appears to offer fairly low value distribution / warehouse jobs, with no justification provided for the numbers of jobs. The area would need to be accessed by car due to the complete lack of any public transport, and no suitable active travel routes. The area would add traffic to an already extremely busy motorway junction, putting further load onto already congested roads and complex motorway junctions. 	<ul style="list-style-type: none"> • In considering potential employment allocations, the Council has used detailed assessment criteria set out in the EDNA - to assess potential site allocations in the context of Warrington’s employment land needs – ; how potential allocations perform against the Local Plan objectives; and assessed sites through the Sustainability Appraisal process. As such the Council is confident it has appropriately considered and balanced a wide range of economic, social and environment factors in establishing the Plan’s allocations, including the SEWEA allocation.

Policy MD6 – South East Warrington Employment Area	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • The Council considers that the Plan’s housing requirement will ensure that issues of affordability are addressed and support the number of jobs that will be created over the Plan period. This will increase opportunities for people to live and work in the Borough. • The allocation policy for the South East Warrington Employment Area in the UPSVLP includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together.
<ul style="list-style-type: none"> • Cheshire Wildlife Trust: Examples of priority habitats including semi-natural woodland, Bradley Brook, ponds and hedgerows are located within the allocation. The mitigation hierarchy should be applied to comply with Policy DC4 and national planning policies and all these areas should be excluded from the allocation in order to avoid harm to biodiversity. Due to the proximity of the allocation site to the proposed South East Warrington Urban Extension (MD2) allocation we believe that any ecological impacts arising as a result of any of these proposed schemes should be assessed in-combination, in line with good practice guidance from CIEEM. 	<ul style="list-style-type: none"> • Policy principles acknowledge that existing environmental/ecological features will need to be protected and enhanced. There is also a requirement for a site wide masterplan to consider the points raised. • The Council has considered potential cumulative impacts with the South East Warrington Urban Extension and other Plan allocations through its Habitats Regulations Assessment.

Policy OS1 – Croft	
Summary of Issues Raised	Response
<i>Residents</i>	
<ul style="list-style-type: none"> • Insufficient evidence to justify Green Belt release. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington’s development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’. • The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East Warrington Employment Area, Thelwall Heys, land to the east and south of Fiddlers Ferry Power Station and the allocation sites in the Outlying Settlements, including Croft. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the site currently makes a weak contribution to Green Belt purposes. Overall, development of the site would not represent encroachment into the countryside as the majority of the site is currently in use as Heathcroft Stud (equestrian use) therefore the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Croft. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.
<ul style="list-style-type: none"> • Scale of proposed development is not in keeping with the size of Croft. Development is not sustainable due to lack of essential services/facilities 	<ul style="list-style-type: none"> • The Council considers that the allocations proposed in the outlying settlements, including in Croft, are of a relatively limited scale which together with the safeguards in the allocations policies will mean that

Policy OS1 – Croft	
Summary of Issues Raised	Response
<p>in the village, including lack of capacity at the primary school, and poor road infrastructure and public transport service.</p>	<p>they will not impact on their respective characters. The level of development in the outlying settlements, including that proposed in Croft, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements.</p> <ul style="list-style-type: none"> • Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity.
<ul style="list-style-type: none"> • Concern that access into the site is unsafe for vehicles and pedestrians and that safe access cannot be achieved. 	<ul style="list-style-type: none"> • Through the site assessment process, the Council’s Highways Officers confirmed that appropriate vehicular and pedestrian access can be provided to the site and that the level of development proposed in Croft can be supported. This is subject to Parts 14 and 15 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development.
<ul style="list-style-type: none"> • Concern that additional sites are being promoted by developers around Croft. 	<ul style="list-style-type: none"> • The Council is not proposing to allocate any further sites in Croft.
<ul style="list-style-type: none"> • The development is not justified and does not meet the needs of the area. 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement and ensure that revised Green Belt boundaries are robust and will endure over the long term. • The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough’s general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable.
<ul style="list-style-type: none"> • Croft has always had flooding problems 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation in Croft is within Flood Zone 1 and therefore flooding is not considered to be an issue.

Policy OS1 – Croft	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Parts 16 and 17 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change
<ul style="list-style-type: none"> • The wildlife Act 1981 states that during bird nesting season that no land can be disturbed, the site has buzzards on. 	<ul style="list-style-type: none"> • Part 10 of the Policy provides protection for any existing habitats on the site, whilst Part 11 of the Policy requires the development to provide biodiversity net gain.
<ul style="list-style-type: none"> • The development goes against COP 26 and will not address impacts of climate change. 	<ul style="list-style-type: none"> • Part 19 of the Policy requires that the development should be designed to mitigate the impacts of climate change: be as energy efficient as possible and meet a proportion of its energy needs from renewable or low carbon sources in accordance with policy ENV7. • The Council’s Car Parking SPD requires that electric charging points are provided in new developments where viable.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • Croft Parish Plan (2018) identified a number of actions that villagers hoped would be taken into consideration during the preparation of the emerging Local Plan (Actions 1, 14 and 15). 99% of those surveyed felt that protecting the Green Belt and Countryside was a very important factor to Croft’s future, therefore, these resident’s views must be listened to. 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement. • The site currently makes a weak contribution to Green Belt purposes. Overall, development of the site would not represent encroachment into the countryside as the majority of the site is currently in use as Heathcroft Stud (equestrian use) therefore the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Croft. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.
<ul style="list-style-type: none"> • There is no evidence that the housing allocated is needed in this area. Croft has limited facilities and would generate car based trips. Affordable housing unlikely to be provided. The site also makes a major contribution to the Green Belt. 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement and ensure that revised Green Belt boundaries are robust and will endure over the long term. • The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough’s general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable.

Policy OS1 – Croft	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The infrastructure and public services would not support the volume of housing proposed. The villages has limited services, there are no retail or employment opportunities. Croft school is at full capacity and over-subscribed, with little scope to extend without building on more Green Belt. 	<ul style="list-style-type: none"> • The level of development in the outlying settlements, including that proposed in Croft, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. • Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity.
<ul style="list-style-type: none"> • Concerns on the increase in traffic on Middleton Lane 	<ul style="list-style-type: none"> • Parts 14 and 15 of the policy require a package of transport improvements to support the development including pedestrian links to existing bus services which the development can support and walking and cycling routes.
Landowner/Developer	
<ul style="list-style-type: none"> • There is strong support from the developer whose site is proposed to be allocated by Policy OS1. • The developer does however make a number of detailed comments on the allocation policy requesting additional flexibility in respect of issues which may impact on viability and where in the developer’s view there is need for additional evidence/justification for infrastructure requirements: <ul style="list-style-type: none"> ○ There should be a caveat in relation to point 2 and that references to viability and the mix of tenure types be inserted into the policy. ○ That flexibility should be introduced to the requirement for 8 and 9 for provision of Public Open Space, playing pitches and built leisure facilities as Bellway wish to comment on the methodology for calculating open space requirements. ○ Point 4 and the provision of self-build plots is should be deleted as this is not suitable for volume builder’s sites. 	<ul style="list-style-type: none"> • Support noted for the allocation. • The Council considers the Policy as written is ‘sound’ and the requirements of the policy fully justified. • The Council has undertaken a comprehensive Local Plan Viability Assessment (2021), which has reviewed all infrastructure requirements and costs for each of the proposed allocations, including Croft. As such, the Council is confident the allocation policy is deliverable. • The Council’s Self-build & Custom Housing Register identifies a significant need for people wishing to commission or build their own homes (self and custom-build properties). In line with Policy DEV2 and paragraph 62 of the NPPF the Council has identified the allocation sites as areas where there is available land in accessible and sustainable locations to help meet this need. • Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement 2019)

Policy OS1 – Croft	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> ○ Point 11 where there is a requirement for net gain for bio diversity should be deleted ○ At point 13 the requirement for compensatory improvements is not clear and does not meet with the PPG requirements for new and enhanced green infrastructure. Requirement should be deleted or clarified. 	<ul style="list-style-type: none"> ● The PPG on Green Belt specifies requirements for compensatory measures where it is necessary to release Green Belt land including measures on both the land itself and on land remaining in the Green Belt. The Council is committed to agreeing a scheme of measures with the developer as their site comes forward for development.
<ul style="list-style-type: none"> ● There are some developers who consider that the site proposed by Policy OS1 is not the most suitable site and that there are alternative sites that are more suitable. These are identified as omitted sites with most representations regarding the Green Belt Assessment of sites, overall housing requirement and physical characteristics of sites. 	<ul style="list-style-type: none"> ● The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> ● The proposed allocation site will cause heavy traffic in the centre of the village and block views of the Parish Church from Mustard Lane in Croft 	<ul style="list-style-type: none"> ● Parts 14 and 15 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. ● Policy DC6 Quality of Places at point 1 specifies the principles of good design that should be followed this includes a positive contribution to local character and distinctiveness and having regard to street layouts, scale, height and massing.
Statutory Consultees	
<ul style="list-style-type: none"> ● United Utilities under the Utilities and Environmental Protection section of the allocation suggests the addition of additional text. <i>'incorporating exemplary multi-functional Sustainable Urban Drainage Systems (SUDS) and flood alleviation measures...'</i> 	<ul style="list-style-type: none"> ● The policy is already comprehensive and the Council considers that this additional text is not necessary. Specific detail on utility requirements is provided in Policy INF3.
<ul style="list-style-type: none"> ● Cheshire Constabulary requests the addition of text under community facilities of 'Appropriate emergency services infrastructure' 	<ul style="list-style-type: none"> ● The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
<ul style="list-style-type: none"> ● National Highways supports the provisions in the policy for Transport Infrastructure 	<ul style="list-style-type: none"> ● Support noted
Other	

Policy OS1 – Croft	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Cheshire Wildlife Trust states that all areas of priority habitats should be excluded from the allocations in order to avoid harm to biodiversity. 	<ul style="list-style-type: none"> Part 10 of the Policy provides protection for any existing habitats on the site, whilst Part 11 of the Policy requires the development to provide net biodiversity gain.

Policy OS2 – Culcheth	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Insufficient evidence to justify Green Belt release. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington’s development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’. • The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East Warrington Employment Area, Thelwall Heys, land to the east and south of Fiddlers Ferry Power Station and the allocation sites in the Outlying Settlements, including Culcheth. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the substantive part of the allocation currently makes a weak contribution to Green Belt purposes. Whilst development would entail a small incursion into undeveloped countryside, the removal of the allocation from the Green Belt will not harm the overall function and integrity of the Green Belt around Culcheth. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.
<ul style="list-style-type: none"> • The Council should be looking at utilising more brownfield sites. 	<ul style="list-style-type: none"> • In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook

Policy OS2 – Culcheth	
Summary of Issues Raised	Response
	<p>additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this was incorporated into the SHLAA.</p> <ul style="list-style-type: none"> • Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
<ul style="list-style-type: none"> • The present road system in Culcheth will not support a development of this size. 	<ul style="list-style-type: none"> • Through the site assessment process, the Council’s Highways Officers confirmed that appropriate vehicular access can be provided to the site and that the level of development proposed in Culcheth can be supported. This is subject to Parts 14 and 15 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development.
<ul style="list-style-type: none"> • The schools in Culcheth are full, the GP surgeries are full, and the local bus service in this area is poor and very limited - the present infrastructure in this area would not be able to support the residents of an extra 200-500 houses. 	<ul style="list-style-type: none"> • The Council considers that the level of development proposed in the outlying settlements, including that proposed in Culcheth, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. • The development will be expected to make a contribution towards primary and secondary school provision and to additional primary care capacity. There is also a requirement for a contribution to be made to expanding and enhancing existing or planned built leisure facilities and playing pitches. The planning of the additional facilities will be

Policy OS2 – Culcheth	
Summary of Issues Raised	Response
	undertaken by the Council in collaboration with relevant providers and will be programmed to meet needs as they arise and increase.
<ul style="list-style-type: none"> • Traffic will increase and air quality will decline. 	<ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • The allocation policy includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality.
<ul style="list-style-type: none"> • The development is not justified and does not meet needs of the area. 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement and ensure that revised Green Belt boundaries are robust and will endure over the long term. • The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough’s general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable.
<ul style="list-style-type: none"> • Concern that more than 200 homes can be accommodated on the site based on the minimum density set out in the Policy. There is also a concern that the developer is looking to allocate a much larger area of land which could accommodate up to 500 homes. 	<ul style="list-style-type: none"> • The minimum figure of 200 homes is based on a net density of 30 dwellings per hectare. This takes into account that part of the site will provide open space and landscaping. • The Council is aware that the developer was originally promoting a larger site. This was considered too large in the context of Culcheth and its social and physical infrastructure. The developer’s wider landholding will

Policy OS2 – Culcheth	
Summary of Issues Raised	Response
	remain in the Green Belt, with the allocation site providing a robust Green Belt boundary.
<ul style="list-style-type: none"> • The Council has not taken into account the development of HS2 and how this will impact on the local road network. 	<ul style="list-style-type: none"> • The Council has taken into account the latest proposals for HS2 in all of its site assessments.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • There is no evidence that the housing allocated is needed in this area. 	<ul style="list-style-type: none"> • The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough's general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable.
<ul style="list-style-type: none"> • Culcheth has limited facilities and would generate car based trips. 	<ul style="list-style-type: none"> • The Council considers that the level of development proposed in the outlying settlements, including that proposed in Culcheth, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. • The development will be expected to make a contribution towards primary and secondary school provision and to additional primary care capacity. There is also a requirement for a contribution to be made to expanding and enhancing existing or planned built leisure facilities and playing pitches. The planning of the additional facilities will be undertaken by the Council in collaboration with relevant providers and will be programmed to meet needs as they arise and increase. • Through the site assessment process, the Council's Highways Officers confirmed that appropriate vehicular access to can be provided to the site and that the level of development proposed in Culcheth can be supported. This is subject to Parts 14 and 15 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development.
<ul style="list-style-type: none"> • The site makes a major contribution to the Green Belt. 	<ul style="list-style-type: none"> • As concluded in the Council's Green Belt Site Selection - Implications of Green Belt Release Report 2021, the site currently makes a weak contribution to Green Belt purposes. Whilst development of the site

Policy OS2 – Culcheth	
Summary of Issues Raised	Response
	would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Culcheth. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.
Landowner/Developer	
<ul style="list-style-type: none"> • There is strong support from the developer whose site is proposed to be allocated by Policy OS2 and they also support the provision of 30% affordable housing on the site. • The developer does however make a number of detailed comments on the allocation policy requesting additional flexibility in respect of issues which may impact on viability and where in the developer’s view there is need for additional evidence/justification for infrastructure requirements: <ul style="list-style-type: none"> ○ the deletion of the requirement for the provision of self-build plots; ○ increased flexibility to allow for the provision to deliver higher minimum densities in appropriate areas of the site; ○ clarification in the policy or explanatory text as to why a contribution towards primary care is required; ○ evidence of the need for a contribution to expanding and enhancing existing or planned built leisure facilities/playing pitches/sustainable transport modes should be provided; and ○ clarification as to the size of the overall open space requirement ○ they do not consider that the part 11 which specifies that net gains in biodiversity should be considered as part of the policy allocation at the moment as it is not consistent with national policy and the position at this stage is transitional 	<ul style="list-style-type: none"> • Support noted. • The Council’s Self-build & Custom Housing Register identifies a significant need for people wishing to commission or build their own homes (self and custom-build properties). In line with Policy DEV2 and paragraph 62 of the NPPF the Council has identified the major allocations as areas where there is available land in accessible and sustainable locations to help meet this need. • A higher density would impact on the setting and adjacent Green Belt boundary and character of the settlement. An average minimum density of 30 dph across the whole of the site is considered to be appropriate. This will not preclude higher densities in parts of the site. • The options assessment process took into account existing infrastructure within the main urban area of Warrington and each of the settlements and was undertaken jointly with other Council teams and partner agencies responsible for service provision. This has included the Council teams responsible for education, parks and open spaces, transportation, culture and leisure and public health, together with the Warrington Clinical Care Commissioning Group and other NHS services operating in the borough. • Part 9 of the policy requires the provision of open space in line with the Council’s open space standards in accordance with Policy DC5. • Biodiversity Net Gain has been mandated for all developments in England that fall under the Town and Country Planning Act 1990 whether or not they impact important wildlife habitats (Chancellor’s Spring Statement

Policy OS2 – Culcheth	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> ○ they consider the delivery of decentralised energy systems is not likely to be practical in most instances and it would currently be uneconomic for most heat networks to install low-carbon technologies. This has not been factored into the viability assessment. ○ Part 19 is not justified: there is no clear justification for the vehicle and HGV thresholds identified and they appear to be arbitrary figures which have reduced dramatically since the previous iteration of the Local Plan. 	<p>2019). The PPG on Green Belt specifies a number of measures for compensatory measures where it is necessary to release Green Belt land including the measures on both the land itself and on where other measures maybe sought this includes biodiversity net gain.</p> <ul style="list-style-type: none"> ● The Council has undertaken a comprehensive Local Plan Viability Assessment (2021), which has reviewed all infrastructure requirements and costs for each of the proposed allocations, including Culcheth. As such, the Council is confident the allocation policy is deliverable. This includes the costs of providing renewable and low carbon energy/decentralised energy infrastructure requirements. ● The evidence for Part 19 of the policy is justified through the Plan’s Habitats Regulation Assessment.
<ul style="list-style-type: none"> ● The developer promoting the site considers that an alternative firm and defensible boundary could be created by including further land under their control in the allocation or as safeguarded land. 	<ul style="list-style-type: none"> ● The Council considers including the additional land in the allocation would result in too large a development in the context of Culcheth and its social and physical infrastructure. The allocation site as proposed will provide a robust Green Belt boundary.
<ul style="list-style-type: none"> ● There are some developers who consider that the site proposed by Policy OS2 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted sites with most representations regarding the Green Belt Assessment of sites, overall housing requirement and physical characteristics of sites. 	<ul style="list-style-type: none"> ● The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
Statutory Consultees	
<ul style="list-style-type: none"> ● National Grid would like an amendment to the policy that requires that a strategy for responding to their overhead transmission lines present on the site which demonstrates how which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design. 	<ul style="list-style-type: none"> ● The policy is already comprehensive and the Council considers that this additional text is not necessary. Specific detail on power infrastructure is provided in INF3.

Policy OS2 – Culcheth	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Cheshire Constabulary requests the addition of text under community facilities of ‘Appropriate emergency services infrastructure’ 	<ul style="list-style-type: none"> The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
<ul style="list-style-type: none"> United Utilities under the Utilities and Environmental Protection section of the allocation suggests the addition the following text. <i>‘incorporating exemplary multi-functional Sustainable Urban Drainage Systems (SUDS) and flood alleviation measures...’</i> 	<ul style="list-style-type: none"> The policy is already comprehensive and the Council considers that this additional text is not necessary. Specific detail on utility requirements is provided in Policy INF3.
<ul style="list-style-type: none"> National Highways supports the provisions in the policy for Transport Infrastructure 	<ul style="list-style-type: none"> Support noted.
Other	
<ul style="list-style-type: none"> Cheshire Wildlife Trust states that all areas of priority habitats should be excluded from the allocations in order to avoid harm to biodiversity. 	<ul style="list-style-type: none"> Part 10 of the Policy provides protection for any existing habitats on the site, whilst Part 11 of the Policy requires the development to provide biodiversity net gain.

Policy OS3 – Hollins Green	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Insufficient evidence to justify Green Belt release. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington’s development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’. • The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East Warrington Employment Area, Thelwall Heys, land to the east and south of Fiddlers Ferry Power Station and the allocation sites in the Outlying Settlements, including Hollins Green. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the substantive part of the allocation currently makes a moderate contribution to Green Belt purposes. Whilst development would entail a small incursion into undeveloped countryside, the removal of the allocation from the Green Belt will not harm the overall function and integrity of the Green Belt around Hollins Green. A new recognisable and permanent Green Belt boundary would be created consisting of the A57 Manchester Road and through strengthening the other existing boundaries.
<ul style="list-style-type: none"> • Concern that development will impact value of property and ruin landscape of area. 	<ul style="list-style-type: none"> • The Council considers that the allocations proposed in the outlying settlements, including in Hollins Green, are of a relatively limited scale

Policy OS3 – Hollins Green	
Summary of Issues Raised	Response
	<p>which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters</p>
<ul style="list-style-type: none"> • Flooding already an issue in Hollins Green. The proposed development will increase flood risk. 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation in Hollins Green is within Flood Zone 1 and therefore flooding is not considered to be an issue. • Parts 16 and 17 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
<ul style="list-style-type: none"> • Development will increase congestion/pollution. 	<ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • The allocation policy includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality.
<ul style="list-style-type: none"> • There are no proposals to extend infrastructure/services to cope with the proposed development. The current infrastructure is insufficient and development will impact on the wellbeing of residents. 	<ul style="list-style-type: none"> • The Council considers that the level of development proposed in the outlying settlements, including that proposed in Hollins Green, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. • The development will be expected to make a contribution towards primary and secondary school provision and to additional primary care capacity. There is also a requirement for a contribution to be made to

Policy OS3 – Hollins Green	
Summary of Issues Raised	Response
	expanding and enhancing existing or planned built leisure facilities and playing pitches. The planning of the additional facilities will be undertaken by the Council in collaboration with relevant providers and will be programmed to meet needs as they arise and increase.
<ul style="list-style-type: none"> • The development is not justified and does not meet needs of area, including the need for bungalows for older people. 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement and ensure that revised Green Belt boundaries are robust and will endure over the long term. • The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough’s general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None received 	
Landowner/Developer	
<ul style="list-style-type: none"> • There is strong support from the developer whose site is proposed to be allocated by Policy OS3, • They have however suggested a number of detailed amendments to the allocation policy: <ul style="list-style-type: none"> ○ Replace the dwelling density from 30dph to 35dph ○ Green belt compensatory improvements should be directed to Rixton Clay Pits SAC by means of a financial contribution. ○ The deletion of point 19 of the policy which requires the development in line with policy ENV7 to be as energy efficient as possible and seek to meet a proportion of its energy from low carbon or renewable sources. This is not in line with the NPPF para 150 as it does not consider location, design and orientation of dwellings. The requirement for decentralised energy supplies is not clarified and is only feasible on larger sites and therefore the clause should be deleted. 	<ul style="list-style-type: none"> • Support noted. • 30dph is considered an appropriate density given the size of the site and it’s edge of settlement location and will not prevent the delivery of more homes. • The PPG on Green Belt specifies requirements for compensatory measures where it is necessary to release Green Belt land including measures on both the land itself and land in the Green Belt. The compensatory measures may be informed by supporting evidence of landscape, biodiversity or recreational improvements. Part 13 of the allocation policy reflects this position. • Part 19 of Policy OS3 refers to Policy ENV7. Part 5 of this policy specifically relates to the strategic housing and employment allocations, including the settlement allocation sites and only requires them to establish or connect to an existing decentralised energy network if it is feasible and viable to do so.

Policy OS3 – Hollins Green	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • There are some developers who consider that the site proposed by Policy OS3 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted sites with most representations regarding the Green Belt Assessment of sites, overall housing requirement and physical characteristics of sites. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
Statutory Consultees	
<ul style="list-style-type: none"> • Cheshire Constabulary requests the addition of text under community facilities of 'Appropriate emergency services infrastructure' 	<ul style="list-style-type: none"> • The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
<ul style="list-style-type: none"> • United Utilities under the Utilities and Environmental Protection section of the allocation suggests the addition of additional text. <i>'incorporating exemplary multi-functional Sustainable Urban Drainage Systems (SUDS) and flood alleviation measures...'</i> 	<ul style="list-style-type: none"> • The policy is already comprehensive and the Council considers that this additional text is not necessary. Specific detail on utility requirements is provided in Policy INF3.
<ul style="list-style-type: none"> • National Highways supports the provisions in the policy for Transport Infrastructure 	<ul style="list-style-type: none"> • Support noted
Other	
<ul style="list-style-type: none"> • CWT states that all areas of priority habitats should be excluded from the allocations in order to avoid harm to biodiversity. 	<ul style="list-style-type: none"> • Part 10 of the Policy provides protection for any existing habitats on the site, whilst Part 11 of the Policy requires the development to provide net biodiversity gain.

Policy OS4 - Lymm - Pool Lane	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Insufficient evidence to justify Green Belt release with concerns that development will fill-in the existing green boundary between communities and villages. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that 'Exceptional Circumstances' exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the 'Exceptional Circumstances'. • The Council considers that 'Exceptional Circumstances' have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East Warrington Employment Area, Thelwall Heys, land to the east and south of Fiddlers Ferry Power Station and the allocation sites in the Outlying Settlements, including the sites in Lymm. • As concluded in the Council's Green Belt Site Selection - Implications of Green Belt Release Report 2021, the northern part of the allocation currently makes a weak contribution to Green Belt purposes and the southern part of the allocation a moderate contribution. Whilst development would entail a small incursion into undeveloped countryside, the removal of the allocation from the Green Belt will not harm the overall function and integrity of the Green Belt around Lymm. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries
<ul style="list-style-type: none"> • Brownfield sites should be developed before Green Belt development. 	<ul style="list-style-type: none"> • In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of

Policy OS4 - Lymm - Pool Lane	
Summary of Issues Raised	Response
	<p>which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity and this was incorporated into the SHLAA.</p> <ul style="list-style-type: none"> • Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
<ul style="list-style-type: none"> • The scale of development proposed represents an overdevelopment of the site and will damage the character of Lymm. Existing infrastructure is already overstretched. Allocations should be more spread out around Lymm. 	<ul style="list-style-type: none"> • The Council considers that the allocations proposed in the outlying settlements, including in Lymm, are of a relatively limited scale which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters. An average minimum density of 30 dph across the whole of the site is considered to be appropriate. The policy at part 2 states the development should be in accordance with the emerging Lymm Neighbourhood Plan and take into account the Lymm Heritage and Character Assessment. • The Council considers that the level of development proposed in the outlying settlements, including that proposed in Lymm, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. • For Lymm this may require the expansion of one of Lymm's primary schools and the provision of a new health facility. The development will also be expected to make a contribution towards secondary school

Policy OS4 - Lymm - Pool Lane	
Summary of Issues Raised	Response
	<p>provision and to expanding and enhancing existing or planned built leisure facilities and playing pitches. The planning of the additional facilities will be undertaken by the Council in collaboration with relevant providers and will be programmed to meet needs as they arise and increase.</p>
<ul style="list-style-type: none"> • There are concerns over environmental damage and loss of biodiversity. The area to the south of Warrington Lane is open grassland with a pleasant outlook, a public footpath and unspoiled wildlife rich pond and wooded area to the southern end. The draft plan suggests this must be preserved but that is unlikely to be possible in practice. 	<ul style="list-style-type: none"> • Part 11 of the Policy provides protection for any existing habitats on the site, whilst Part 12 of the Policy requires the development to provide biodiversity net gain.
<ul style="list-style-type: none"> • Area is prone to flooding and development is likely to increase flood risk. 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation is predominantly within Flood Zone 1. A small element of the northern part of the allocation is within Flood Zone 2 but this is not considered to be a constraint in respect of the development of the site. • Parts 18 and 19 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
<ul style="list-style-type: none"> • The road infrastructure in the area is inadequate and the increased levels of traffic will cause increased pollution, noise and be hazardous. The site is not well connected to the centre of Lymm in terms of walking and cycling. 	<ul style="list-style-type: none"> • Through the site assessment process, the Council's Highways Officers confirmed that appropriate vehicular access to can be provided to the site and that the level of development proposed in Lymm can be supported. This is subject to Parts 15 and 16 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development. These include requirements for connections into the wider footway network around the site providing connectivity with the existing community. • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as

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	<p>emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised.</p> <ul style="list-style-type: none"> • The allocation policy includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality. • Policy ENV8 at points 11 sets out a requirement mitigation of noise in the design and layout of development. Noise levels from vehicles on roads are expected to reduce over time as electric cars become more prevalent.
<ul style="list-style-type: none"> • Development is not justified, does not meet the needs of the area and is unlikely to deliver affordable housing. 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement and ensure that revised Green Belt boundaries are robust and will endure over the long term. • The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough's general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable. • Policy DEV2 includes specific safeguards to ensure that affordable housing in south Warrington is genuinely affordable. These safeguards will apply to the allocation sites in Lymm.
<ul style="list-style-type: none"> • Given the high value of land in Lymm, development should provide more than 30% affordable housing. 	<ul style="list-style-type: none"> • The affordable housing requirement is a minimum figure. In addition, there are additional safeguards within Policy DEV2 to ensure that affordable housing is genuinely affordable in high value areas such as Lymm.
MP, Borough Councillor, Town or Parish Councillor / Council	

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Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The northern site area is close to the Grade 2 listed Statham Lodge and development could impact on this heritage asset. 	<ul style="list-style-type: none"> • Part 23 of the policy requires development to take account of the proposed mitigation and enhancement measures outlined in the Heritage Impact Assessment for the site. This has been prepared working closely with Historic England.
<ul style="list-style-type: none"> • The site is near to the motorway so giving rise to noise and air pollution issues. 	<ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • Policy ENV8 at points 11 sets out a requirement mitigation of noise in the design and layout of development. Noise levels from vehicles on roads are expected to reduce over time as electric cars become more prevalent.
<ul style="list-style-type: none"> • If the southern site is developed the trees and hedges next to the public footpath and the pond near the Trans Pennine Trail must be retained. 	<ul style="list-style-type: none"> • Part 11 states that the layout of the development should take account of existing landscape features including trees and significant hedgerows.
<ul style="list-style-type: none"> • There are general statements about the need for school places but could children be accommodated at Statham Primary School or would they have to be driven elsewhere? 	<ul style="list-style-type: none"> • The Council's education officers have indicated that it is possible to provide additional capacity, if required, by expanding one of Lymm's existing primary schools, subject to detailed feasibility. Proposals for this will come forward in due course if necessary. This will ensure Lymm as a whole is well provided for in terms of primary school places and all children will have the opportunity to attend a school in proximity to where they live.
<ul style="list-style-type: none"> • At School start and finish times there is currently congestion problems on this stretch of road. Developments either side of the road would worsen these problems and worsen pollution. 	<ul style="list-style-type: none"> • Through the site assessment process, the Council's Highways Officers confirmed that appropriate vehicular access to can be provided to the site and that the level of development proposed in Lymm can be

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Summary of Issues Raised	Response
	<p>supported. This is subject to Parts 15 and 16 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development. These include requirements for connections into the wider footway network around the site providing connectivity with the existing community.</p> <ul style="list-style-type: none"> • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • The allocation policy includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality.
<ul style="list-style-type: none"> • Flooding is an issue in this area. 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation is predominantly within Flood Zone 1. A small element of the northern part of the allocation is within Flood Zone 2 but this is not considered to be a constraint in respect of the development of the site. • Parts 18 and 19 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
<ul style="list-style-type: none"> • The site is prominent when approaching Lymm from the west and would lessons the gap with Thelwall. 	<ul style="list-style-type: none"> • The potential implications of releasing the 'selected sites' from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundary are addressed in the Council's

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	Implications of Green Belt Release Report (August 2021). In respect of the sites around Lymm the conclusion is that their removal from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt.
<ul style="list-style-type: none"> • The evidence fails to recognise the cumulative impact of the Green Belt releases in this area and does not provide details on how improvements to existing Green Belt will be made. 	<ul style="list-style-type: none"> • The potential implications of releasing the 'selected sites' from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundary are addressed in the Council's Implications of Green Belt Release Report (August 2021). In respect of the sites around Lymm the conclusion is that their removal from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. • Different sites offer differing opportunities for compensatory Green Belt improvements and will therefore be considered for each site at the planning application stage.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • Gladman Developments Ltd support the allocation. The site is not subject to any technical, landownership or viability constraints that would preclude development. 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • It is pointed out that the site is in Flood Zones 2 and 3 and this should preclude its allocation. 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation is predominantly within Flood Zone 1. A small element of the northern part of the allocation is within Flood Zone 2 but this is not considered to be a constraint in respect of the development of the site. • Parts 18 and 19 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
<ul style="list-style-type: none"> • There are some developers who consider that the site proposed to be allocated by Policy OS4 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.

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Summary of Issues Raised	Response
allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted sites with most representations regarding the Green Belt Assessment of sites, overall housing requirement and physical characteristics of sites.	
Statutory Consultees	
<ul style="list-style-type: none"> Historic England supports the proposed policy and heritage impact assessment. Site Allocation OS4, is accompanied by a heritage impact assessment (HIA). The proposed policy ensures that any proposals will be required to preserve and enhance the historic environment. The policy reference to the HIA also ensures that this evidence is included in the site requirements for the site and that any proposals will need to be in accordance with it, including the implementation of recommended mitigation and design measures. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> United Utilities under the Utilities and Environmental Protection section of the allocation suggests the addition of additional text. <i>'incorporating exemplary multi-functional Sustainable Urban Drainage Systems (SUDS) and flood alleviation measures...'</i>. 	<ul style="list-style-type: none"> The policy is already comprehensive and the Council considers that this additional text is not necessary. Specific detail on utility requirements is provided in Policy INF3.
<ul style="list-style-type: none"> Cheshire Constabulary requests the addition of text under community facilities of 'Appropriate emergency services infrastructure'. 	<ul style="list-style-type: none"> The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
<ul style="list-style-type: none"> National Highways supports the provisions in the policy for Transport Infrastructure. 	<ul style="list-style-type: none"> Support noted.
Other	
<ul style="list-style-type: none"> Cheshire Wildlife Trust states that all areas of priority habitats should be excluded from the allocations in order to avoid harm to biodiversity. 	<ul style="list-style-type: none"> Part 11 of the Policy provides protection for any existing habitats on the site, whilst Part 12 of the Policy requires the development to provide biodiversity net gain.
<ul style="list-style-type: none"> The Lymm Neighbourhood Plan group comment that Lymm has seen significant development over the last 40 years, with next to no investment in infrastructure. The current draft Local Plan does not commit to correcting this. The state of some of the key active travel 	<ul style="list-style-type: none"> The Council considers that the level of development proposed in the outlying settlements, including that proposed in Lymm, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. For Lymm this may require the expansion

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Summary of Issues Raised	Response
<p>routes to main areas (housing areas and village centre to schools) is such that they are not usable by able bodied people for large parts of the year. The existing sports fields are of such poor quality with severe drainage issues that they are not usable for large parts of the sports seasons. The proposals for investment & improved drainage are welcome, but should be given a schedule e.g. within a five year window; or could be made dependent on progress of the local plan. Flooding issues must be dealt with. The release of Greenbelt next to Statham School appears to include release of the allotment gardens, with no explanation / alternative provision. It is not clear how existing schools in Lymm will accommodate the level of development proposed.</p>	<p>of one of Lymm’s primary schools and the provision of a new health facility. The development will also be expected to make a contribution towards secondary school provision and to expanding and enhancing existing or planned built leisure facilities and playing pitches. The planning of the additional facilities will be undertaken by the Council in collaboration with relevant providers and will be programmed to meet needs as they arise and increase.</p> <ul style="list-style-type: none"> • The Council’s education officers have indicated that it is possible to provide additional capacity, if required, by expanding one of Lymm’s existing primary schools, subject to detailed feasibility. Proposals for this will come forward in due course if necessary. This will ensure Lymm as a whole is well provided for in terms of primary school places and all children will have the opportunity to attend a school in proximity to where they live. • Through the site assessment process, the Council’s Highways Officers confirmed that appropriate vehicular access to can be provided to the site and that the level of development proposed in Lymm can be supported. This is subject to Parts 15 and 16 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development. These include requirements for connections into the wider footway network around the site providing connectivity with the existing community. • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation is predominantly within Flood Zone 1. A small element of the northern part of the allocation is within Flood Zone 2 but this is not considered to be a constraint in respect of the development of the site.

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Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Parts 18 and 19 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change. • The existing allotments will be protected given they fall under the Plan's definition of Green Infrastructure. As such they will be protected and will only be developed if appropriate alternative provision is secured.

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Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Insufficient evidence to justify Green Belt release. There are concerns that development will fill-in the existing green boundary between communities and villages and demarcation between Outrightington and Lymm will be lost. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington’s development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’. • The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East Warrington Employment Area, Thelwall Heys, land to the east and south of Fiddlers Ferry Power Station and the allocation sites in the Outlying Settlements, including the sites in Lymm. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the allocation makes a weak contribution to Green Belt purposes. The removal of the allocation will not harm the overall function and integrity of the Green Belt around Lymm. A new recognisable and permanent Green Belt boundary would be created consisting of the Bridgewater Canal and through strengthening the other existing boundaries.
<ul style="list-style-type: none"> • Brownfield sites should be developed before Green Belt development. 	<ul style="list-style-type: none"> • In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area

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Summary of Issues Raised	Response
	<p>to identify additional brownfield capacity and this was incorporated into the SHLAA.</p> <ul style="list-style-type: none"> • Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land. • The Council will continue to review all potential brownfield development sites through its annual SHLAA process and through future reviews of the Local Plan.
<ul style="list-style-type: none"> • The scale of development proposed will damage the character of Lymm. Existing infrastructure is already overstretched and new infrastructure should be built before the houses are developed, not afterwards. 	<ul style="list-style-type: none"> • The Council considers that the allocations proposed in the outlying settlements, including in Lymm, are of a relatively limited scale which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters. An average minimum density of 30 dph across the whole of the site is considered to be appropriate. The policy at part 2 states the development should be in accordance with the emerging Lymm Neighbourhood Plan and take into account the Lymm Heritage and Character Assessment. • The Council considers that the level of development proposed in the outlying settlements, including that proposed in Lymm, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. • For Lymm this may require the expansion of one of Lymm’s primary schools and the provision of a new health facility. The development will also be expected to make a contribution towards secondary school provision and to expanding and enhancing existing or planned built leisure facilities and playing pitches. The planning of the additional

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Summary of Issues Raised	Response
	<p>facilities will be undertaken by the Council in collaboration with relevant providers and will be programmed to meet needs as they arise and increase.</p>
<ul style="list-style-type: none"> • There are concerns over the certainty of whether the health centre will be developed and that this will just replace the existing surgeries in Lymm and will not be in addition to them. Any new health facility must be built before the new homes. 	<ul style="list-style-type: none"> • The Policy provides safeguards to ensure the timely delivery of the new health facility. The Warrington NHS Clinical Commissioning Group have undertaken an assessment of the capacity of the existing GP surgeries in Lymm. A new health centre would replace the two existing GP facilities. It will provide the two practices with capacity to expand their operation to accommodate for new as well as existing patients in a modern purpose built facility.
<ul style="list-style-type: none"> • The development will result in an increase in traffic and pollution levels. Transport and accessibility measures in paragraph 15 need to be made far more stringent. Walking and cycling routes into village are not currently safe. Development will adversely affect popular walking route alongside canal. 	<ul style="list-style-type: none"> • Through the site assessment process, the Council’s Highways Officers confirmed that appropriate vehicular access to can be provided to the site and that the level of development proposed in Lymm can be supported. This is subject to Parts 15, 16 and 17 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development. These include requirements for connections into the wider footway network around the site, including the Bridgewater Canal towpath, providing connectivity with the existing community. • The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. • The allocation policy includes a range of measures to promote active transport, including walking and cycling, and improve public transport

Policy OS5 - Lymm – Rushgreen Road	
Summary of Issues Raised	Response
	<p>serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality.</p> <ul style="list-style-type: none"> • Policy ENV8 at points 11 sets out a requirement mitigation of noise in the design and layout of development. Noise levels from vehicles on roads are expected to reduce over time as electric cars become more prevalent
<ul style="list-style-type: none"> • There are concerns in respect of environmental damage and loss of biodiversity. 	<ul style="list-style-type: none"> • Part 11 of the Policy provides protection for any existing habitats on the site, whilst Part 12 of the Policy requires the development to provide biodiversity net gain.
<ul style="list-style-type: none"> • The area is subject to flooding additional development will make this worse. 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation is within Flood Zone 1 and therefore flooding is not considered to be an issue. • Parts 18 and 20 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
<ul style="list-style-type: none"> • Proposed development is not attuned to climate change and no evidence of requirements for better than minimum energy efficient measures in place. 	<ul style="list-style-type: none"> • The policy at point 22 states that the development should be designed to mitigate the impacts of climate change: be as energy efficient as possible and meet a proportion of its energy needs from renewable or low carbon sources in accordance with policy ENV7.
<ul style="list-style-type: none"> • Development is not justified, does not meet the needs of the area and is unlikely to deliver affordable housing. In particular, workers at the proposed South East Warrington Employment Location will be low skilled/low paid raising the question over affordability of properties in the area for them. 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement and ensure that revised Green Belt boundaries are robust and will endure over the long term. • The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough's general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable. • Policy DEV2 includes specific safeguards to ensure that affordable housing in south Warrington is genuinely affordable. These safeguards will apply to the allocation sites in Lymm.

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Summary of Issues Raised	Response
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> Concerns that developments will fill-in the existing green boundary between communities and villages, demarcation between Outrightington and Lymm will be lost. 	<ul style="list-style-type: none"> As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the allocation makes a weak contribution to Green Belt purposes. The removal of the allocation will not harm the overall function and integrity of the Green Belt around Lymm. A new recognisable and permanent Green Belt boundary would be created consisting of the Bridgewater Canal and through strengthening the other existing boundaries.
<ul style="list-style-type: none"> Access on to Rushgreen Road is a safety hazard. It is also a highly visible site from the Canal. If the allocation proceeds the developer should provide a foot/cycle bridge over the Bridgewater Canal. 	<ul style="list-style-type: none"> Through the site assessment process, the Council’s Highways Officers confirmed that appropriate vehicular access to can be provided to the site and that the level of development proposed in Lymm can be supported. This is subject to Parts 15, 16 and 17 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development. These include requirements for connections into the wider footway network around the site, including the Bridgewater Canal towpath, providing connectivity with the existing community.
<ul style="list-style-type: none"> The requirement for the provision of a new Health Centre is welcomed. 	<ul style="list-style-type: none"> Support noted.
<ul style="list-style-type: none"> The proposed allocation of land at Rushgreen Road is poorly presented and appears to give limited consideration to the development of adjoining land under planning permission 2017/31816. There are also Inconsistencies between the description of the site in the August 2021 Green Belt Assessment and the land proposed for allocation in UPSVLP which does not reference the land now developed but currently in the designated Green Belt. 	<ul style="list-style-type: none"> The Council has updated its relevant site assessments to take into consideration the consented development which has now been implemented within the wider site allocation.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> Whilst the principal site promoters support the allocation, they consider that the boundary should be amended to reflect the existing planning permission for housing at Tanyard Farm with the inclusion of other associated land on the eastern boundary within the allocation. 	<ul style="list-style-type: none"> The Council has taken into account the consented development in defining the wider site allocation boundary. The Council considers that the Policy as written is ‘sound’ and that the requirements of the policy are fully evidenced and justified. The Council

Policy OS5 - Lymm – Rushgreen Road	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> There are a number of changes proposed to the policy by the principal site promoters. The changes proposed refer to additional evidence/justification for infrastructure requirements and greater flexibility regarding the type, form and design of development with the proposed removal of a large number of the allocation's policy requirements. 	<p>has undertaken a comprehensive Local Plan Viability Assessment (2021), which has reviewed all infrastructure requirements and costs for each of the proposed allocations, including Lymm. As such, the Council is confident the allocation policy is deliverable.</p> <ul style="list-style-type: none"> Non-material changes identified may be considered as minor modifications if the appointed Inspector is of the view that these will improve the policy.
<ul style="list-style-type: none"> There are some developers who consider that the site proposed to be allocated by Policy OS5 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted sites with most representations regarding the Green Belt Assessment of sites, overall housing requirement and physical characteristics of sites. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
Statutory Consultees	
<ul style="list-style-type: none"> United Utilities under the Utilities and Environmental Protection section of the allocation suggests the addition of additional text. <i>'incorporating exemplary multi-functional Sustainable Urban Drainage Systems (SUDS) and flood alleviation measures...'</i> and in respect of the implications of the public sewer passing through this area. 	<ul style="list-style-type: none"> The policy is already comprehensive and the Council considers that this additional text is not necessary. Specific detail on utility requirements is provided in Policy INF3.
<ul style="list-style-type: none"> Cheshire Constabulary requests the addition of text under community facilities of 'Appropriate emergency services infrastructure'. 	<ul style="list-style-type: none"> The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
<ul style="list-style-type: none"> National Highways supports the provisions in the policy for Transport Infrastructure. 	<ul style="list-style-type: none"> Support noted.
Other Organisations	
<ul style="list-style-type: none"> Cheshire Wildlife Trust states that all areas of priority habitats should be excluded from the allocations in order to avoid harm to biodiversity. 	<ul style="list-style-type: none"> Part 11 of the Policy provides protection for any existing habitats on the site, whilst Part 12 of the Policy requires the development to provide biodiversity net gain.

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Summary of Issues Raised	Response
<ul style="list-style-type: none"> The Lymm Neighbourhood Plan group comment that Lymm has seen significant development over the last 40 years, with next to no investment in infrastructure. The current draft Local Plan does not commit to correcting this. The state of some of the key active travel routes to main areas (housing areas and village centre to schools) is such that they are not usable by able bodied people for large parts of the year. The existing sports fields are of such poor quality with severe drainage issues that they are not usable for large parts of the sports seasons. The proposals for investment & improved drainage are welcome, but should be given a schedule e.g. within a five year window; or could be made dependent on progress of the local plan. Flooding issues must be dealt with. It is not clear how existing schools in Lymm will accommodate the level of development proposed. 	<ul style="list-style-type: none"> The Council considers that the level of development proposed in the outlying settlements, including that proposed in Lymm, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. For Lymm this may require the expansion of one of Lymm’s primary schools and the provision of a new health facility. The development will also be expected to make a contribution towards secondary school provision and to expanding and enhancing existing or planned built leisure facilities and playing pitches. The planning of the additional facilities will be undertaken by the Council in collaboration with relevant providers and will be programmed to meet needs as they arise and increase. The Council’s education officers have indicated that it is possible to provide additional capacity, if required, by expanding one of Lymm’s existing primary schools, subject to detailed feasibility. Proposals for this will come forward in due course if necessary. This will ensure Lymm as a whole is well provided for in terms of primary school places and all children will have the opportunity to attend a school in proximity to where they live. Through the site assessment process, the Council’s Highways Officers confirmed that appropriate vehicular access to can be provided to the site and that the level of development proposed in Lymm can be supported. This is subject to Parts 15 and 16 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development. These include requirements for connections into the wider footway network around the site providing connectivity with the existing community. The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation is predominantly within Flood Zone 1. A small element of the northern part of the

Policy OS5 - Lymm – Rushgreen Road	
Summary of Issues Raised	Response
	<p>allocation is within Flood Zone 2 but this is not considered to be a constraint in respect of the development of the site.</p> <ul style="list-style-type: none"> • Parts 18 and 19 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.

Policy OS6 – Winwick	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Insufficient evidence to justify Green Belt release. 	<ul style="list-style-type: none"> • In accordance with paragraph 141 of the NPPF (2021), the Council has fully examined all other reasonable options for meeting its development needs, including making as much use as possible of Brownfield sites, before concluding that ‘Exceptional Circumstances’ exist to justify Green Belt release. • The requirement to ensure that sufficient land is provided to meet Warrington’s development needs, that housing affordability is addressed, and the creation of new sustainable communities, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites, are considered to constitute the ‘Exceptional Circumstances’. • The Council considers that ‘Exceptional Circumstances’ have been fully evidenced and demonstrated for each area of Green Belt release, including the: South East Warrington Urban Extension, South East Warrington Employment Area, Thelwall Heys, land to the east and south of Fiddlers Ferry Power Station and the allocation sites in the Outlying Settlements, including the sites in Winwick. • As concluded in the Council’s Green Belt Site Selection - Implications of Green Belt Release Report 2021, the allocation site currently makes a moderate contribution to Green Belt purposes. Whilst development would entail a small incursion into undeveloped countryside, the removal of the allocation site from the Green Belt will not harm the overall function and integrity of the Green Belt around Winwick. A new recognisable and permanent Green Belt boundary would be created by strengthening existing boundaries
<ul style="list-style-type: none"> • Together with Parkside and Peel Hall developments the additional development at Winwick will further overload the local road system which cannot cope with extra traffic. There is also a lack of doctors, dentists, school places and shops. 	<ul style="list-style-type: none"> • To support the Council’s Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both

Policy OS6 – Winwick	
Summary of Issues Raised	Response
	<p>the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable.</p> <ul style="list-style-type: none"> • Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. As part of the provision transport measures cycling and walking routes will be required to connect with existing networks. • The Council considers that the level of development proposed in the outlying settlements, including that proposed in Winwick, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. The policy requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity. The development will be expected to provide minimum open space/equipped play in line with Council standards • The Parkside development which is in St Helens has a S106 Agreement which includes payments towards works to the local road infrastructure, school provision, health care, green and open space provision and other infrastructure that is deemed necessarily to support the developments. • The allocation policy for the Peel Hall development specifies a range of infrastructure to be provided by developers of the site this includes: arrange of community facilities within a local centre (new primary school, residential care home and local shops); extensive highway and transport improvements; contributions to a new health care facility; and extensive open space and recreation provision.
<ul style="list-style-type: none"> • Concern that access into the site is unsafe for vehicles and pedestrians and that safe access cannot be achieved. 	<ul style="list-style-type: none"> • Through the site assessment process, the Council’s Highways Officers confirmed that appropriate vehicular and pedestrian access can be provided to the site and that the level of development proposed in Croft can be supported. This is subject to Parts 14 and 15 of the policy which

Policy OS6 – Winwick	
Summary of Issues Raised	Response
	require a Transport Assessment and associated package of transport improvement measures to support the development.
<ul style="list-style-type: none"> • The development will be damaging to the climate and environment. It will increase road traffic pollution and decrease air quality and have a negative impact on people’s wellbeing. 	<ul style="list-style-type: none"> • The Local Plan contains specific objectives and policies relating to health and wellbeing, improving air quality, protecting existing areas of open space and green infrastructure and providing new and improved areas of open space and green infrastructure. The impact of the Local Plan on health and wellbeing was a key consideration in the Sustainability Appraisal process. The Local Plan Air Quality Modelling Report concludes that the burden of poor air quality on people’s health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. • The policy at point 19 states that the development should be designed to mitigate the impacts of climate change: be as energy efficient as possible and meet a proportion of its energy needs from renewable or low carbon sources in accordance with policy ENV7.
<ul style="list-style-type: none"> • There are concerns on the impact on local wildlife and the loss of biodiversity as green areas are developed. 	<ul style="list-style-type: none"> • Policy DC4 seeks to protect priority species and habitats on development sites and achieve a net gain in biodiversity in line with section 40 of the Natural Environment and Rural Communities Act and the NPPF (2019 update) which indicates that in delivering sustainable development local authorities should enhance as well as protect biodiversity and natural habitats. This is strengthened by parts 10 and 11 of the policy which references the need for developers to take account of existing landscape features and reference to the DEFRA metric for biodiversity net gain.
<ul style="list-style-type: none"> • Concern on potential flooding as a result of the development 	<ul style="list-style-type: none"> • The Updated PSVLP is supported by a Level 1 & Level 2 Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation is within Flood Zone 1 and therefore flooding is not considered to be an issue.

Policy OS6 – Winwick	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Parts 16 and 17 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.
<ul style="list-style-type: none"> • The development is not justified and does not meet the needs of the area. 	<ul style="list-style-type: none"> • The allocation will support the sustainable development of the settlement and ensure that revised Green Belt boundaries are robust and will endure over the long term. • The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough’s general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable.
<ul style="list-style-type: none"> • Concerns that the development will destroy the character of the village 	<ul style="list-style-type: none"> • The Council considers that the allocations proposed in the outlying settlements, including in Winwick, are of a relatively limited scale which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters. • The allocation policy at part 23 specifies that that development proposals will be required to be in accordance with the Winwick Heritage Impact Assessment which has been prepared working closely with Historic England.
<ul style="list-style-type: none"> • There are health concerns in respect of the future occupants of the site due to the Overhead High Voltage Electric pylon route through the middle of the site. 	<ul style="list-style-type: none"> • The Council has taken into consideration National Grid’s guidance on the proximity of housing development to powerlines when considering whether to allocate the site.
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • Winwick Parish Council object to this allocation as it will: increasing pressure on the road system exacerbating existing problems; the primary school is on a constrained site and cannot take more development despite the policy allowing for increased capacity; and the site is close to an historical battlefield site which will be put risk through any development. 	<ul style="list-style-type: none"> • To support the Council’s Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local

Policy OS6 – Winwick	
Summary of Issues Raised	Response
	<p>highway network and the selected sites were considered to be acceptable.</p> <ul style="list-style-type: none"> • Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. As part of the provision transport measures cycling and walking routes will be required to connect with existing networks. • The Council considers that the level of development proposed in the outlying settlements, including that proposed in Winwick, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. The policy requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity. • The priority for school allocations is Warrington based children. At the moment some schools are taking children from neighbouring St Helens, if there are issues with capacity the schools the numbers from outside Warrington will be reduced. • The development will also be expected to provide minimum open space/equipped play in line with Council standards. • Part 24 of the allocation policy specifies any development proposals will be expected to conserve and enhance the historic significance, appearance and integrity of and the ability to understand and appreciate the setting of the Battle of Winwick.
Landowner/Developer	
<ul style="list-style-type: none"> • The developer promoting the site supports the allocation but has proposed a number of detailed changes to the Policy. The changes proposed refer to additional evidence/justification for infrastructure requirements and greater flexibility regarding the type, form and design of development with the proposed removal of a number of the allocation's policy requirements 	<ul style="list-style-type: none"> • The Council considers that the Policy as written is 'sound' and that the requirements of the policy are fully evidenced and justified. The Council has undertaken a comprehensive Local Plan Viability Assessment (2021), which has reviewed all infrastructure requirements and costs for each of the proposed allocations, including Winwick. As such, the Council is confident the allocation policy is deliverable.

Policy OS6 – Winwick	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Non-material changes identified may be considered as minor modifications if the appointed Inspector is of the view that these will improve the policy.
<ul style="list-style-type: none"> • There are some developers who consider that the site proposed to be allocated by Policy OS6 is not the most suitable site and that there are alternative sites that are more suitable, or that there should be additional allocations in Green Belt around the settlement to meet housing needs. These are identified as omitted sites with most representations regarding the Green Belt Assessment of sites, overall housing requirement and physical characteristics of sites. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
Statutory Consultees	
<ul style="list-style-type: none"> • Cheshire Constabulary requests the addition of text under community facilities of ‘Appropriate emergency services infrastructure’ 	<ul style="list-style-type: none"> • The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
<ul style="list-style-type: none"> • Historic England supports the policy and the Heritage Impact Assessment 	<ul style="list-style-type: none"> • Support noted.
<ul style="list-style-type: none"> • United Utilities under the Utilities and Environmental Protection section of the allocation suggests the addition of additional text. ‘<i>incorporating exemplary multi-functional Sustainable Urban Drainage Systems (SUDS) and flood alleviation measures...</i>’ and have suggested extensive additional text 18 concerning their asset and operational facility close to the site. 	<ul style="list-style-type: none"> • The policy is already comprehensive and the Council considers that this additional text is not necessary. Specific detail on utility requirements is provided in Policy INF3.
<ul style="list-style-type: none"> • National Highways supports the provisions in the policy for Transport Infrastructure. 	<ul style="list-style-type: none"> • Support noted.
Other	
<ul style="list-style-type: none"> • The Battlefields Trust believes that the allocation should be removed from the Plan as St Helen’s consultants found that the historic battlefield was very sensitive to development was high not moderate. 	<ul style="list-style-type: none"> • Part 24 of the allocation policy specifies any development proposals will be expected to conserve and enhance the historic significance, appearance and integrity of and the ability to understand and appreciate the setting of the Battle of Winwick. This is considered sufficient to protect the battlefield.

Policy OS6 – Winwick

Summary of Issues Raised

- The Winwick Parish and Residents group states that local education capacity cannot be met by the policy; the policy relies on unapproved road improvements; the inability to provide local services contradicts policy INF1; Green Belt release will give rise to ground water hazards and supplies (no evidence of consultation with United Utilities); and that inadequate protection for historic assets and for the battlefield.

Response

- To support the Council’s Local Plan, a new transport model has been developed. Warrington Multi Modal Transport Model (WMMTM) has been used to inform site allocations and is considered to be a robust assessment tool to assess the impacts of proposed development on both the SRN and the LRN. All the sites in the settlements that were considered for allocation were assessed for their impacts on the local highway network and the selected sites were considered to be acceptable.
- Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. As part of the provision transport measures cycling and walking routes will be required to connect with existing networks.
- The Local Authority as the Highways network manager for local roads will only agree to the development once a S106 agreement for contributions to highway works is made and that a S278 agreement is in place for works carried out by the developer.
- The Highways Agency that oversees the strategic network supports the policy.
- The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity. The priority for school allocations is Warrington based children, at the moment some schools are taking children from neighbouring St Helens, if there are issues with capacity the schools the numbers from outside Warrington will be reduced.
- The development will also be expected to provide minimum open space/equipped play in line with Council standards.
- Parts 16, 17 and 18 concern protection for flood, ground water and United Utilities neighbouring asset. United Utilities are a statutory consultee and the policy wording has been developed during previous consultations.

Policy OS6 – Winwick	
Summary of Issues Raised	Response
	<ul style="list-style-type: none"> • Part 24 of the allocation policy specifies any development proposals will be expected to conserve and enhance the historic significance, appearance and integrity of and the ability to understand and appreciate the setting of the Battle of Winwick. This is considered sufficient to protect the battlefield. • Historic England support the policy and Heritage Impact Assessment. • The Parkside development which is in St Helens has a S106 Agreement which includes payments towards works to the local road infrastructure, school provision, health care, green and open space provision and other infrastructure that is deemed necessarily to support the developments. • The allocation policy for the Peel Hall development specifies a range of infrastructure to be provided by developers of the site this includes: arrange of community facilities within a local centre (new primary school, residential care home and local shops); extensive highway and transport improvements; contributions to a new health care facility; and extensive open space and recreation provision.

Policy M1 - Monitoring and Review Policy	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None 	
Landowner/Developer	
<ul style="list-style-type: none"> • Support for inclusion of Policy M1, suggest more detailed policy wording/trigger points should be included to ensure that when a target is not met and policy needs to be reviewed this is dealt with. 	<ul style="list-style-type: none"> • Comments noted. The Council considers the monitoring framework in draft Policy M1 is sufficiently robust.
<ul style="list-style-type: none"> • More comprehensive approach should be taken to the monitoring and delivery of Policy MD2 and Policy MD6. 	<ul style="list-style-type: none"> • The Council considers that draft Policy M1 sufficiently provides for the monitoring of major development areas.
<ul style="list-style-type: none"> • Draft Policy M1 fails to include flexibility and provides no contingencies if a site fails to deliver in line with the trajectory. There is a need to identify safeguarded land as a contingency option to meet housing needs over the plan period. 	<ul style="list-style-type: none"> • The Council considers that draft Policy M1 sufficiently provides for monitoring of delivery over the plan period and the plan provides for contingency in the form of over allocation of land at the largest allocation, the South East Warrington Urban Extension. This is considered to be the most sustainable way of building flexibility into the plan whilst minimising the impact on the Green Belt.
<ul style="list-style-type: none"> • The proposed approach to a review of employment land needs is wholly inadequate – it is not referenced in Policy M1 with a clear mechanism to trigger the review. 	<ul style="list-style-type: none"> • The Council considers that the commitment to review employment land needs is appropriately considered within draft Policy DEV4. The Council has an obligation to monitor development in any case through its Annual Monitoring Report.
<ul style="list-style-type: none"> • Support for including a policy highlighting the actions to be taken if housing is not delivered. However, it is considered that the Council may also want to consider alternate measures such as the granting of planning permission for unallocated sites in sustainable locations. The Council may also want to consider how this policy sits with the Housing Delivery Test and the presumption in favour of sustainable development as set out in the NPPF. 	<ul style="list-style-type: none"> • Comments noted. The Council considers that the additional points raised are dealt with elsewhere in other parts of the plan or within national policy and guidance and therefore there is no need to repeat these provisions within Policy M1.

Policy M1 - Monitoring and Review Policy	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Object to the consideration for increasing density on allocated sites to increase delivery of housing – increasing density does not necessarily make development more viable. 	<ul style="list-style-type: none"> • Comments noted. Increasing densities will be an option to consider on allocated sites if delivery of housing becomes an issue over the plan period. This will be considered alongside other options and on a site by site basis taking viability considerations into account.
<ul style="list-style-type: none"> • The policy must be reconsidered to enable sites to be brought forward rapidly if there is a shortfall in delivery after 1 year of 25% or more. In addition, the policy should require that in the event that housing delivery falls below 75% of the annual requirement for three consecutive years, the plan will be subject to a formal review. 	<ul style="list-style-type: none"> • Comments noted. The Council considers the monitoring framework in draft Policy M1 is sufficiently robust.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	
Other	
<ul style="list-style-type: none"> • Warrington Climate Emergency Commission – Targets and monitoring indicators relating to Policy ENV7 could be strengthened. Indicators relating to renewable energy infrastructure could be more explicit. There should be quantifiable targets in relation to low-carbon policies which can be monitored more easily. Policy INF1 could also have more explicit monitoring metrics. 	<ul style="list-style-type: none"> • Comments noted. The Council considers the monitoring framework in Policy M1 is sufficiently robust.
<ul style="list-style-type: none"> • CPRE - It is important that performance against local plan policy indicators as set out in Appendix 2 are captured in Annual Monitoring Report. The local plan should keep track of the carbon lifecycle of developments that it allows in the future to better understand how new development contributes to carbon zero target of 2030. 	<ul style="list-style-type: none"> • Comments noted. The Council considers the monitoring framework in Policy M1 is sufficiently robust.

Policies Map	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	
Landowner/Developer	
<ul style="list-style-type: none"> • Mr and Mrs Hickman have requested that their land is removed from the Green Belt and put into the MD6 allocation. 	<ul style="list-style-type: none"> • Comment noted. The Council considers that the Updated PSVLP 2021 is sound in its current form, however, should the appointed Inspector consider it appropriate to include this land within the proposed MD6 allocation then the Council considers that this change can be made as a modification.
<ul style="list-style-type: none"> • Amendment is required to proposal map annotations for land under control of NWP, which is located to the north-east of 720 and 730 Birchwood Boulevard. The land is currently annotated as both an existing employment area (DEV4 Existing Employment Areas) and as open space (DC3 / DC5 Open Space). 	<ul style="list-style-type: none"> • Comment noted. The Council considers that the Updated PSVLP 2021 is sound in its current form, however, should the appointed Inspector consider it appropriate to make this change this can be addressed through a modification.
<ul style="list-style-type: none"> • Omega West Limited are concerned that the Policies Map does not show the most up to date information in relation to the Scheduled Ancient Monument (Pickett Hamilton Fort) which has been moved by consent to a different location and granted Grade II status. The map needs to be updated. 	<ul style="list-style-type: none"> • Comment noted. The Council considers that the Updated PSVLP 2021 is sound in its current form, however, should the appointed Inspector consider it appropriate to make this change this can be addressed through a modification.
<ul style="list-style-type: none"> • The site allocation boundary on the Polices Map should be amended to incorporate the following land: No. 78 Rushgreen Road (along the Rushgreen Road frontage) which was subject to the grant of planning permission 2017/31816. Inconsistencies between the description of the site in the August 2021 Green Belt Assessment and the land proposed for allocation in Updated PSVLP which does not reference the land now developed but currently in the designated Green Belt. 	<ul style="list-style-type: none"> • Comment noted. The Council considers that the Updated PSVLP2021 is sound in its current form, however, should the appointed Inspector consider it appropriate to make this change this can be addressed through a modification.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	
Other	

Policies Map	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • Depending on national decisions about the future of HS2, it is considered that changes to the Plan (e.g. the route as shown on the Policies Map) will be needed to address this issue. 	<ul style="list-style-type: none"> • It is not considered necessary to amend the draft Plan at this stage as no changes have been indicated by HS2. The Updated PSVLP 2021 is considered to be sound in its current form and will be monitored and reviewed at relevant periods as recommended by the NPPF.

Omitted Sites	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	
Landowner/Developer	
<ul style="list-style-type: none"> • Clay Lane, Burtonwood 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> • Land east of M6 J21 and parcels to the north and south of A57 for employment use. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt. • The Council has given detailed consideration to the allocation of land at J21 of the M6, given the relatively strong performance of the site through the EDNA grading and that this site is not impacted to the same extent in respect of peat resources as land being promoted immediately to the south of Birchwood station. Nevertheless, the Council does not consider this site performs as well as Fiddlers Ferry and the South East Warrington Employment area, given its strong Green Belt performance and concerns regarding intervening landownership which could place limitations on the scale and location of employment that could be developed on the site. • The Council will however consider this site as part of any future review of employment land in accordance with Policy DEV4 of the Updated PSVLP (2021).
<ul style="list-style-type: none"> • Land north of Omega should be allocated for employment use. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the

Omitted Sites	
Summary of Issues Raised	Response
	<p>most sustainable way of meetings Warrington’s employment development needs as part of the Plan’s overall Spatial Strategy, whilst ensuring the long term integrity of Warrington’s Green Belt.</p>
<ul style="list-style-type: none"> • South Station Place, Birchwood for a new Net Carbon Zero Public Transport Led Community and Employment Hub. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meetings Warrington’s employment development needs as part of the Plan’s overall Spatial Strategy, whilst ensuring the long term integrity of Warrington’s Green Belt. • The Council has reviewed the information submitted by the developer but is of the opinion that at this stage, land to the south of Birchwood Station is also an unreasonable option for employment development. The developer has carried out some provisional investigation into underlying peat, but the Council’s ecological consultants do not think this is sufficient to overcome what would likely to be a significant objection from Natural England. Further, whilst the council agrees there are long term benefits in terms of access to the station and potential improvements to the station including a new park and ride facility, the developer has not submitted any detailed proposals in terms and viability and deliverability. Further, the daytime frequency of rail services on the Warrington to Manchester / Liverpool line ,including and in particular at Birchwood Station, is planned to be reduced from December 2022 as part of Network Rail’s Manchester Rail Recovery Taskforce programme. Therefore, whilst the principle of station improvements is supported by Network Rail and the Rail Delivery Group, and the council continues to lobby hard for further enhancements, the Council is concerned at this stage, that the committed service levels from December 2022 are unlikely to support the business case for the station improvements and park and ride facility proposed, and insufficient evidence has been produced by the developer to indicate otherwise. As such, the Council will consider land south of Birchwood as

Omitted Sites	
Summary of Issues Raised	Response
	part of any future review of employment land in accordance with Policy DEV4 of the UPSVLP 2021.
<ul style="list-style-type: none"> • Land off Abbey Close, Croft for residential development. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> • Land to the North and South of Camsley Lane, Lymm for residential development. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> • Land at Junction M62 J11 for motorway services and associated facilities. 	<ul style="list-style-type: none"> • There is no specific requirement for the Local Plan to make provision for a Motorway Service Area. National Highways have confirmed they do not have responsibility for meeting the need for Motorway Service Areas and this is not an issue they would expect to be addressed through Duty to Co-operate discussions.
<ul style="list-style-type: none"> • Land at Six56 (Knutsford Road) Phase II for long term employment development. 	<ul style="list-style-type: none"> • The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt. • The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in locations such as Appleton Thorn, Warrington Town Centre and the wider urban area, meeting some ongoing needs during, and after the Plan period, and compensating for some losses of employment land to other uses. • The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment, including Six56 Phase II. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide

Omitted Sites	
Summary of Issues Raised	Response
	<p>safeguarded sites. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.</p> <ul style="list-style-type: none"> • It should also be noted that the western extension of Omega in the Borough of St Helens has been now been approved at Inquiry, and the additional consented land could make a contribution to meeting Warrington's employment land needs, over and above the 31.22ha already agreed through the Duty to Cooperate process.
<ul style="list-style-type: none"> • Land at Arley Road, Appleton Thorn for residential development. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> • Land adjacent to A50, Grappenhall (part of the former Garden Suburb allocation) should be allocated as a standalone site for residential development. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> • Land previously identified as 'Garden Suburb', should be allocated as previously drafted in the PSVLP (2019). 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> • Land at Heath Lane/Sandy Lane, Croft for residential development. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> • Land at Pepper Street and Sutch Lane, Lymm for residential development. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> • Land south of Sutch Lane, Lymm for residential development. 	<ul style="list-style-type: none"> • The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.

Omitted Sites	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Land formerly proposed to be allocated as the South West Urban Extension. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at Reddish Lane, Lymm for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at Lumber Lane Burtonwood for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at Port Warrington for employment uses. 	<ul style="list-style-type: none"> Port Warrington was proposed to be allocated in the previous PSVLP 2019, but extending the Port will result in loss of part of Moore Nature Reserve and there are significant concerns regarding the potential impact on the Western Link. In particular, to mitigate the impact on the Western Link it is likely that significant additional capacity will need to be provided at the junctions of the Western Link and the A57 and the A56. The scale of improvements required to these junctions is likely to raise significant engineering, deliverability and viability issues. The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. By this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
<ul style="list-style-type: none"> Land at Rushgreen Road, Lymm for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at Phipps Lane, Burtonwood should be reinstated, as per the previous draft plan, for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.

Omitted Sites	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> Land opposite Warrington Sports Club, Wlaton Lea Road for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at ADS Recycle Yard, Camsley Lane for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Riverside Trading Estate, Station Road, Penketh for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land to the rear of The Plough on Mill Lane, Houghton Green for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land to the west of Culcheth for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land to the south of Glazebrook Train Station for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at Warrington Road, east of Culcheth for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at Kenyon Lane Junction for either residential or employment development. 	<ul style="list-style-type: none"> The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt.
<ul style="list-style-type: none"> Land north east of Junction 9 M62/A49 for employment development. 	<ul style="list-style-type: none"> The Updated PSVLP 2021 is informed by a comprehensive Economic Development Needs Assessment (EDNA 2021). The Council is confident the amount of land being proposed for employment uses in the updated

Omitted Sites	
Summary of Issues Raised	Response
	<p>PSVLP 2021, based on past take up rates, is robust and in line with the EDNA (2021) recommendations.</p> <ul style="list-style-type: none"> The Council has assessed a range of options for the spatial distribution of Green Belt release to meet employment land needs. It considers that the areas of Green Belt release proposed in the PSVLP (2021) provide the most sustainable way of meeting Warrington's employment development needs as part of the Plan's overall Spatial Strategy, whilst ensuring the long term integrity of Warrington's Green Belt.
<ul style="list-style-type: none"> Land at Mill Lane, Lymm for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land east of Bell Lane, Thelwall for development in the context of the South East Warrington Urban Extension. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at Cherry Lane Farm, Lymm for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Land at Reddish Crescent/Rushgreen Road for residential development. 	<ul style="list-style-type: none"> The Council is confident that its site assessment process is robust and that the conclusions reached in terms of the proposed site allocations are appropriate.
<ul style="list-style-type: none"> Landowner promoting land at Three Acres Farm, Glazebury for Green Belt release considers it should be designated through the Local Plan Review for housing to support the Glazebury community and growth which at the present time has very limited affordable housing. The site makes a weak contribution to Green Belt purposes in the Council's Green Belt Assessment (2016), is in single ownership, is available for residential development and other than its Green Belt designation is not subject to any other constraints. Glazebury does not have an allocation in the Local Plan, however, all settlements can play a role in delivering sustainable development in rural 	<ul style="list-style-type: none"> No sites were identified for Glazebury given there were no sites that were not strongly performing in Green Belt terms which performed sufficiently well against the assessment criteria. This site was considered as part of the Local Plan process but is not adjacent to the settlement boundary and is considered too far removed from the local centre of Glazebury.

Omitted Sites	
Summary of Issues Raised	Response
<p>areas and an allocation here will safeguard the vitality and vibrance of the settlement. Three Acres Farm is situated on the boundary of Warrington/Leigh in a highly sustainable location within walking distance to many facilities and schools. Many local amenities are situated within a short walk of the site and would provide a day to day services and facilities for the new residents of the site.</p>	
<ul style="list-style-type: none"> Land at the junction of Lady Lane and Mustard Lane in Croft should be removed from the Green Belt and allocated for residential development. There appears to be no suitable justification for this land to remain within the Green Belt considering that it comprises part of Croft, which has already, in part, been removed from the Green Belt and identified as an Inset Settlement. 	<ul style="list-style-type: none"> The Council considers that the Green Belt boundaries as proposed to be amended are sound. However, the Inspector might be minded to suggest modifications to the current policy as written to reflect the comments made, if they consider it is necessary to make the Plan 'sound'.
Statutory Consultees	
<ul style="list-style-type: none"> None. 	
Other	
<ul style="list-style-type: none"> None. 	

Evidence Base - Infrastructure Delivery Plan (IDP)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • Need for a properly costed and funded Infrastructure Delivery Plan. Current IDP lacks detail and certainty of funding and delivery. 	<ul style="list-style-type: none"> • The Infrastructure Delivery Plan (IDP) has been developed with partners – including Council and external partner service providers - to identify the infrastructure required to support new development. The IDP is a 'live' document and will continue to be updated but it is considered proportionate to the stage of plan preparation. The cost of the infrastructure identified has also been considered within the Local Plan Viability Assessment in order to demonstrate deliverability.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • None. 	
Landowner/Developer	
<ul style="list-style-type: none"> • The IDP is generally supported as a 'live document' which will continue to be updated. The principal landowners of the SEWUE do have concerns regarding inconsistencies of some of the figures and commitments specified in the document. 	<ul style="list-style-type: none"> • Comments noted. The Council is aware of some inconsistencies in the IDP and will continue to review and update the document. It should be noted that any inconsistencies do not affect the Local Plan Viability Assessment.
<ul style="list-style-type: none"> • The costs and requirements for health and leisure facilities within the SEWUE as identified in the IDP need to be aligned with the requirements of Policy MD2. 	<ul style="list-style-type: none"> • The Infrastructure Delivery Plan (IDP) has been developed with partners – including Council and external partner service providers - to identify the infrastructure required to support new development. The IDP is a 'live' document and will continue to be updated.
Statutory Consultees	
<ul style="list-style-type: none"> • Cheshire Constabulary - The IDP neither considers nor makes any provision for future emergency services infrastructure requirements as fundamental elements of sustainable development. Although work by the Constabulary is currently on-going to establish the precise Police infrastructure requirements for the allocated housing sites, this should not preclude the Council from including a requirement in the IDP and local plan. 	<ul style="list-style-type: none"> • The Council will engage with the Cheshire Constabulary to consider their future needs. The Council has not been presented at the current time with any evidence to demonstrate that specific emergency services provision needs to be made through the local plan and the accompanying IDP.
<ul style="list-style-type: none"> • National Highways – It is noted that the IDP is intended as a 'live' document and this should ensure that any infrastructure identified later in the plan process can still be included. 	<ul style="list-style-type: none"> • Comments noted.

Evidence Base - Infrastructure Delivery Plan (IDP)	
Summary of Issues Raised	Response
<i>Other</i>	
<ul style="list-style-type: none"> • Lymm Neighbourhood Plan Group - The overall funding gap on the Infrastructure Delivery Plan suggests that a significant proportion of proposed infrastructure may not get delivered, the plan shows no measurable commitments for the vast majority of projects. The level of detail provided is insufficient. 	<ul style="list-style-type: none"> • The Infrastructure Delivery Plan (IDP) has been developed with partners – including Council and external partner service providers - to identify the infrastructure required to support new development. The IDP is a 'live' document and will continue to be updated but it is considered proportionate to the stage of plan preparation. The cost of the infrastructure identified has also been considered within the Local Plan Viability Assessment in order to demonstrate deliverability.

Evidence Base – Transport Evidence	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> LTP4 not specific enough and should include plans to upgrade existing infrastructure. 	<ul style="list-style-type: none"> The Council's LTP 4 has informed the Updated PSVLP (2021) which ensures both spatial strategies are integrated. However, whilst LTP4 does identify work streams to assess where infrastructure might be required to support the plan, and commits to commissioning evidence/studies, it is not the role of LTP4 to include plans for upgrading existing infrastructure, per se.
<ul style="list-style-type: none"> Transport for Quality of Life Report-The Impacts of Road Projects in England, suggests that new road schemes will have little economic benefit yet damage the environment and landscape. 	<ul style="list-style-type: none"> The Council's Sustainability Assessment has been used as an assessment tool to assess the impacts of the Local Plan and the identified supporting infrastructure covering Social, economic and environmental impacts.
<ul style="list-style-type: none"> Concern that the Warrington Multimodal Transport Model is overly optimistic in its conclusion, does not take account of how the COVID pandemic has altered commuting patterns and does not provide an appropriate basis for supporting the development allocations in the Local Plan. 	<ul style="list-style-type: none"> The Council is confident the Warrington Multimodal Transport Model provides a robust, comprehensive and proportionate evidence base for the Local Plan in respect of assessing the transportation impacts of the Plan as a whole and in respect of individual development allocations.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None
Landowner/Developer	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None.
Statutory Consultees	
<ul style="list-style-type: none"> Highways England: It is considered that the transport evidence provided at this stage is strong, displaying evidence throughout to be able to inform National Highways of the impact of the plan proposals at the SRN, at both an individual site allocation level, and on a cumulative basis. The technical note submitted as part of the Local Plan evidence base does not include M56 Junction 11 in its study area, as the purpose of the note is to demonstrate the impact of the Local Plan on the WWL scheme itself. Along with a number of comments, it is noted that the assessment concludes that "the developments could have a significant impact on the Western Link". As such, it is suggested that further assessments are 	<ul style="list-style-type: none"> Comments duly noted. The impact of the local plan on the SRN, including with the WWL in place, has been assessed as part of the strategic modelling report, including the impact on M56 J11 and further information can be found in the relevant reports. The council is happy to carry out further assessments in partnership with National Highways and Halton BC at appropriate points through the delivery of the plan.

Evidence Base – Transport Evidence	
Summary of Issues Raised	Response
undertaken at M56 Junction 11 to account for both the Local Plan growth, and the delivery of the WWL scheme over the life of the Plan.	
<i>Other</i>	
• None.	• None.

Evidence Base - Brownfield Register	
Summary of Issues Raised	Response
Residents	
• None.	•
MP, Borough Councillor, Town or Parish Councillor / Council	
• None.	•
Landowner/Developer	
• None.	•
Statutory Consultees	
• None.	•
Other	
<ul style="list-style-type: none"> Cheshire Wildlife Trust (CWT) consider that brownfield sites of high environmental value can deliver alternative multi-functional GI benefits (as per NPPF Para 120b) and therefore an alternative strategy to the development of these sites should be investigated as a matter of priority. CWT would like to see an assessment of the environmental value of sites listed on the Council's Brownfield Register, to ensure no sites of high value (or those where development would conflict with other policies in the NPPF, including causing harm to designated sites of importance for biodiversity) are brought forward for development. 	<ul style="list-style-type: none"> All of the sites on the Council's Brownfield Register are derived from the SHLAA. The SHLAA assessment of suitability, availability and achievability has identified any sites with environmental value and they have either been classified as constrained and so do not form part of the housing supply or their environmental value has been taken into account in determining the sites capacity.

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The South Warrington Parish Councils (Lymm, Grappenhall & Thelwall, Appleton, Stretton, Hatton and Walton) consider that the assessment of Green Belt is weak and erroneous in places. There are instances in the proposed SEWUE and SEW Employment Area where strong performing parcels are proposed for allocation while weaker performing ones are not. • The GB Assessment fails to fully consider the purpose of the Green Belt in protecting the setting of historic settlements. 	<ul style="list-style-type: none"> • 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 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 Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt Release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated ‘Proposed Submission Version Local Plan’. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries. • The Council are satisfied that these reports provide a robust assessment of the performance of Warrington’s Green Belt and the implications of releasing the proposed allocation sites. • The aim of the Green Belt Assessment is to provide an objective, evidence-based and independent assessment of how Warrington’s Green Belt contributes to the five purposes of Green Belt set out in national policy, one of which is to preserve the setting and special character of <u>historic towns</u>. In relation to purpose 4, the approach is clearly explained and justified in the method at paragraphs 110-130 of the 2016 Green Belt Assessment Report.
Landowner/Developer	
<ul style="list-style-type: none"> • A site promoter of a site adjacent to a washed over settlement continues to have a fundamental objection to the Green Belt Assessment evidence 	<ul style="list-style-type: none"> • Green Belt Village Reviews adopt a different methodology compared to Green Belt Assessments which consider the five purposes of Green Belt

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
<p>base, as whilst it was updated in May 2018 to include additional site assessments in the Main Urban Area, as well as additional 2021 Green Belt Assessments in relation to Fiddlers Ferry and the other proposed allocations across the Borough, it remains unchanged in terms of its failure to assess whether villages should be ‘washed over’ by the Green Belt or inset from it.</p> <ul style="list-style-type: none"> • The Council’s Green Belt evidence base still fails to consider whether villages lying in the Green Belt should continue to be ‘washed’ over by the Green Belt, or whether there is scope for the settlement boundary to not be ‘washed’ over and the green belt designation to surround just the village boundary instead. This is a fundamental concern that needs rectifying, being an issue that has prevailed despite the Local Plan now being at an advanced stage and scheduled for submission for Examination in Public next year. There is now a need to assess the contribution villages such as Broomedge make to the openness of the Green Belt, to ensure compliance with NPPF paragraph 144 (previously 86) which represents a material change to the policy context when Warrington last assessed ‘washed over’ Green Belt villages. The upshot of paragraph 144 is that if a village’s character makes an important contribution to the essential characteristic of the Green Belt (i.e. its openness), then there is justification to maintain the village in the Green Belt. However, if there are areas within the village that are not open in character, or the village as a whole does not make an important contribution to the openness, retaining the village in the Green Belt, either through the washing over or ‘infilling’ of the village, would be entirely at odds with paragraph 144. Indeed, this would also be at odds with paragraph 143, which confirms local authorities should ‘not include land which it is unnecessary to keep permanently open’ when defining Green Belt boundaries. It is also at odds with the NPPF policies which support a thriving rural economy and the ability for villages to support 	<p>(paragraph 138) due to the different policy requirements of paragraph 140 of the NPPF. A Green Belt Village Review would provide recommendations as to whether a village should remain within the Green Belt or could be excluded from the Green Belt based on paragraph 144 of the NPPF. A recommendation for removal from the Green Belt would not imply that the village would be suitable for development given that Policy DEV1 of the Updated Proposed Submission Version Local Plan (2021) sets out the Council’s proposed distribution of housing. If the Council took forward a recommendation to remove a village from the Green Belt it would still need to demonstrate exceptional circumstances in accordance with paragraph 140 NPPF.</p> <ul style="list-style-type: none"> • The Council does not consider there has been any material change in any of the washed over Green Belt settlements that would alter the rationale for their classification following the adoption of the Local Plan Core Strategy in 2014. Given the limit size of the washed over settlements and their lack of service provision, the Council does not consider that these are sustainable locations for development. There are a limited number of washed over settlements which have either been removed from the Green Belt or have had their boundaries revised as a consequence of Green Belt boundary changes in respect of the main urban area.

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
<p>sustainable development (paragraph 79). In carrying out this fundamental additional work, we believe there are strong arguments and facts that would lead to Broomedge being identified as a village settlement that can be omitted from the Green Belt (with the precise boundaries to be defined) and that some moderate additional growth would help meet local needs and support/sustain existing services within the local community.</p>	
<ul style="list-style-type: none"> • A Green Belt Assessment was carried out by the Council in 2018 of the land subject to Draft Policy OS5 and the adjoining land controlled by Majornet Ltd & Bellway Homes. The Council's assessment finds that the land a 'Weak' contribution to the purposes of the Green Belt. As part of the Updated PSVLP (2021) the Council has undertaken a revised assessment (Green Belt Site Selection - Implications of Green Belt Release, Aug 2021). Whilst, the report maintains the Weak conclusion it does not reflect the situation now 'on the ground' and any sense of the site contributing to Green Belt purposes has been further diminished by the implementation of the Bellway Homes scheme for 64 no. new homes. 	<ul style="list-style-type: none"> • The Council has taken the existing development into account in the site selection process and in confirming the allocation of the site.
<ul style="list-style-type: none"> • Several developers and/or landowners, whose sites have not been allocated, object to the conclusions of the Green Belt Assessment in respect of their particular sites (the Omission Sites). • Several developers consider that the methodology adopted for assessing the Green Belt sites is flawed; has not been applied consistently and relies too much on professional judgement and therefore it is not clear how the overall conclusions of the assessment have been reached. 	<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • The Council's 2018 Green Belt Assessment and 2021 Green Belt Report concludes that the Hollins Green site (OS3) makes an overall moderate contribution to the Green Belt. Richborough Estates disagrees with this assessment and it has been demonstrated by Richborough Estates' own 	<ul style="list-style-type: none"> • 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 method is based on a review of national policy, guidance and good practice. The inclusion of a very

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
<p>assessment that the site makes an overall weak contribution to the Green Belt.</p>	<p>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> <ul style="list-style-type: none"> • The Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt Release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated ‘Proposed Submission Version Local Plan’. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries. • The Council are satisfied that these reports provide a robust assessment of the performance of Warrington’s Green Belt and the implications of releasing the proposed allocation sites.
<ul style="list-style-type: none"> • Developers whose land was included in the Garden Suburb Allocation in the previous PSVLP 2019 consider that proposed amended Green Belt boundaries in the South East Warrington Urban Extension are weak and are therefore not consistent with the NPPF. The overarching strategic ‘weak’ assessment should have a bearing on the individual parcel assessments but this does not seem to have been considered fully. Further, the original detailed site assessments are based on ownership boundaries alone and fail to recognise that none of the landowners have promoted their sites on an individual basis. Whilst they may have been submitted to the Council as part of a call for site exercise based on control/ownership, they have largely been put forward in the context of the Council identifying the scope for a large Garden Suburb proposal very early on in its plan making process at the Issues and Options stage. As such, Arup’s professional judgement conclusions on all of the smaller parcels are arrived at out of context because they fail to recognise that the manner in which these parcels have been promoted for development by the landowners 	<ul style="list-style-type: none"> • A full assessment of the amended Green Belt boundaries has been undertaken and it concludes that the proposed amended boundary is robust and will endure well beyond the plan period. The boundary has not been determined solely on land ownership but has been informed by realistic options for a smaller urban extension, taking into account existing boundaries and landscape features. Indeed these will be strengthened where necessary. It should also be recognised that the SEWUE is made up largely of weaker performing Green Belt parcels and the boundaries of these weaker parcels have also contributed to the revised Green Belt boundary in this location. • The consideration of the Green Belt implications for different spatial options for the South East Urban Extension is documented in the ‘Green Belt Assessment - Garden Suburb Options Report 2021’. The assessment of the final proposed allocation boundary is contained in the ‘Green Belt Site Selection - Implications of Green Belt Release’ Report 2021.

Evidence Base - Green Belt Assessment	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • A number of developers have noted that reference is made to a Green Belt Assessments Collated Report but this has not been made available for comment. 	<ul style="list-style-type: none"> • It is acknowledged that the Green Belt Assessments Collated Report was not published as part of the Regulation 19 consultation. This was due to an issue in making the document accessible for publication on the Council's web site. This document has now been published. It does not contain any new information that has not already been published in the previous reports. It merely compiles already available information into a more user friendly format.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • Stretton NDP - The Green Belt Assessments undertaken by the Council's consultants (Arup & Partners), over the three maturations of the local plan, specifically applied to the area in and around the village of Stretton are flawed and inconsistent. The conclusions regarding parcel R18/088 are contested. The inclusion of land area R18/088 West has and will be to the benefit of WBC and Wallace Land Investments. It presents a disproportionate and unjustified effect upon the village of Stretton and requires resolution to maintain the Green Belt. 	<ul style="list-style-type: none"> • 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 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 Updated PSVLP (2021) is supported by a Green Belt Site Selection – Implications of Green Belt Release Report (2021), which summarises the implications for the Green Belt resulting from the proposed allocations in the updated 'Proposed Submission Version Local Plan'. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundaries. • The Council are satisfied that these reports provide a robust assessment of the performance of Warrington's Green Belt and the implications of releasing the proposed allocation sites.

Evidence Base - Habitat Regulations Assessment (HRA)	
Summary of Issues Raised	Response
<i>Residents</i>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
<ul style="list-style-type: none"> • Stretton Parish Council consider that the loss of areas of greenfields to development in south Warrington will have a significant and severe impact on biodiversity in the area and across the borough. The HRA Update 2021 was only published just before the new PSVLP and hence cannot have properly assessed the impacts of the Draft Plan. The HRA recognises impacts on Rixton Clay Pits and Manchester Mosses Special Area of Conservation from the south Warrington proposals. Acceptance of development is dependent on ongoing reduction of transport emissions. This approach in the HRA is considered dubious as the reduction will only be seen at the end of the plan period and takes no account of development through the plan period. The Plan reflects the position from LTP4 that vehicle movements can be restricted. There is no explanation of how this can be achieved. This contradicts evidence from the Stobart development and consequently there is no rationality behind identifying and controlling air pollution. 	<ul style="list-style-type: none"> • Notwithstanding its date of publication the HRA has been developed over a number of months in parallel to the Draft Local Plan (the Updated PSVLP 2021) and hence has fully assessed the impacts of the Draft Plan. The HRA has modelled the impacts of transport emissions (air quality) based on the proposed policies in the Plan and relevant national legislation with regard to the phasing out of internal combustion engine (ICE) owned vehicles.
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
<i>Statutory Consultees</i>	
<ul style="list-style-type: none"> • Natural England have provided a detailed response to the Habitats Regulation Assessment, requesting additional information and clarification in respect of a number of issues. • Through ongoing Duty to Cooperate discussions, Natural England have also expressed concern regarding the potential impact of the Plan on Holcroft Moss within Manchester Mosses Special Area of Conservation, including the in combination impact with the Greater Manchester 'Places for Everyone' Plan. 	<ul style="list-style-type: none"> • The Council is able to provide the additional information and clarification requested by Natural England and will incorporate this into an updated version of the Habitats Regulation Assessment ahead of the Examination in Public. Through Duty to Co-operate discussions, Natural England have agreed in principle that this will resolve the issues they have raised (with the exception of Holcroft Moss as detailed below) subject to the HRA being updated accordingly. • With regard Holcroft Moss, the Council will undertake more detailed air quality modelling to fully understand the impact arising from additional

Evidence Base - Habitat Regulations Assessment (HRA)	
Summary of Issues Raised	Response
	<p>vehicle movements on the M62 likely to be generated from the Plan. The Council will then undertake joint work with the Greater Manchester authorities to confirm appropriate mitigation measures for agreement with Natural England. The Council will incorporate the outcome of this work into its updated Habitats Regulation Assessment ahead of the Examination in Public. It should be noted that the Council's Statement of Common Ground, signed by the relevant Greater Manchester authorities and Natural England, confirms this approach.</p>
Other	
<ul style="list-style-type: none"> Cheshire Wildlife Trust has significant concerns with the potential in-combination effects of the scale of development proposed in the Mersey Valley Corridor (a key green infrastructure opportunity area identified in the WLP) and South East Warrington. Warrington Waterfront (MD1), South East Warrington Urban Extension (MD2), Fiddlers Ferry (MD3), the South East Warrington Employment Area (MD6) and the Warrington Western Link (WWL) all have the potential to cause significant in-combination effects to a range of important ecological features throughout and beyond Warrington. Most notably this includes the internationally designated Mersey Estuary SPA and Ramsar site, it's assemblages of qualifying bird species and the habitats and land that are functionally linked to the main site. CWT consider that the development of the Fiddlers Ferry site will cause harm to at least two locally designated sites of importance for biodiversity (Upper Mersey Estuary Local Wildlife Site and the St Helens Canal disused LWS) and may potentially cause harm to the internationally designated sites further downstream (Mersey Estuary SPA and Ramsar). 	<ul style="list-style-type: none"> Paragraphs 4.3 to 4.14 of the HRA discuss the potential for losses of functionally linked land due to development in Warrington Waterfront (MD1), South East Warrington Urban Extension (MD2) and Fiddler's Ferry (MD3), drawing on survey data as far as it exists either from site-specific surveys or the Cheshire Bird Atlas. Therefore, they have all been considered cumulatively and in combination. The determination of whether a parcel of land is likely to constitute significant functionally-linked habitat utilises a '1% of the SPA population' threshold specifically in order to capture the fact that, while 1% of the population is a small percentage, cumulative losses of land parcels supporting 1% of the population can be significant 'in combination'. The potential for a site to serve as functionally-linked land cannot be excluded until several seasons of survey have been undertaken and this is why paragraph 4.10 of the HRA (and the policy text of allocations MD1 to MD3) identify the need for project level HRA accompanied by the necessary wintering bird surveys in order to close out the issue. This is a common approach to dealing with functionally-linked land in Local Plans and takes account of Advocate-General Kokott's advice that 'It would also hardly be proper to require a greater level of detail in preceding plans [than lower tier plans or planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of

Evidence Base - Habitat Regulations Assessment (HRA)	
Summary of Issues Raised	Response
	<p>implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure'. This approach also takes account of the fact that these developments will be delivered over long timescales over the course of the plan period and ecological surveys will therefore need repeating and updating to accompany planning applications. This approach therefore avoids considerable time and expense being undertaken doing potentially redundant survey work.</p> <ul style="list-style-type: none"> • Whilst, Policy MD6 (South East Warrington Employment Area) contains suitable habitat to be functionally-linked land paragraph 4.9 of the HRA notes that the site lies 14km from the Mersey Estuary SPA and Ramsar site which is at (if not beyond) the typical distances non-breeding waterfowl and waders are likely to travel to forage and roost. With specific regard to lapwing, Natural England's Impact Risk Zone guidance for birds (Natural England (2019). Impact Risk Zones Guidance Summary Sites of Special Scientific Interest Notified for Birds. Version 1.1) states that 'Developments affecting functionally linked land more than 10km from the site are unlikely to impact significantly on designated populations.' The omission of reference to HRA in the policy simply reflects the low risk that this site will be functionally-linked land but does not preclude an HRA for the planning application in line with legal requirements.

Evidence Base - Site Assessments	
Summary of Issues Raised	Response
Residents	
• None.	•
MP, Borough Councillor, Town or Parish Councillor / Council	
• None.	•
Landowner/Developer	
<ul style="list-style-type: none"> • Majornet Ltd & Bellway Homes - The 2021 local plan evidence base is supported by a new site assessment proforma report that considers additional sites. There is no new information in these proformas relating to the land subject to Draft Policy OS5 (Ref: R18/P2/085 in Site Assessments), together with the adjoining land that now has planning consent. The assessment undertaken through the proforma appears dated and it does not reflect the most up-to-date available evidence base. It is agreed that the land is highly suitable as a site allocation and there is no reason to doubt that it could come forward for development in a timely fashion. It is considered that the site is significantly more suitable for release from the Green Belt as an allocation than the Site Assessment Proforma suggests. 	<ul style="list-style-type: none"> • The Council is confident the site assessment process fully supports the allocation of this site. The Council too into account the consented scheme is re-affirming the allocation ahead of the publication of the Updated PSVLP 2021.
Statutory Consultees	
• None.	•
Other (0):	
• None.	•

Evidence Base - Site Selection Methodology	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • Objects to the loss of Green Belt land allocated for development because consists of the best and most versatile agricultural land that according to the NPPF should be protected from development. 	<ul style="list-style-type: none"> • The quality of agricultural land was taken into account in the Council's spatial option and site assessment processes and in the Plan's Sustainability Appraisal. The Council has sought to minimise the loss of the best and most versatile agricultural land. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan's objectives and SA/SEA site assessment criteria to establish that the sites were 'suitable'. The agricultural quality of the land was just one of the criteria that were used to assess the sites. Since the majority of the borough is covered by similar quality agricultural land this has little impact on the overall assessment of sites. The amount of land to be removed from the Green Belt (and hence the amount of BMVAL to be lost) has significantly reduced in the Updated PSVLP (2021) compared to the previous PSVLP (2019). It is now only proposed to remove 5% of land from the Green Belt compared to 11% previously. The vast amount of agricultural land in the borough will be retained.
Landowner/Developer	
<ul style="list-style-type: none"> • The Development Options and Site Assessment Technical Report states that all sites in the outlying settlements making a strong contribution to the Green Belt have been discounted. Promoters of sites in the outlying settlements disagree that all such sites should have been discounted in principle. This is just one of many factors that should be weighed in the balance when considering whether to allocate a site for development and release it from the Green Belt. The Council has identified the site allocation at Fiddlers Ferry, which relates to land that partly makes a strong contribution to the Green Belt as per the assessments carried out for the local plan evidence base. We consider that further consideration should be given to the impact of potential alternative on the Green Belt 	<ul style="list-style-type: none"> • The methodology for assessing sites was developed by independent consultant's following a review of national guidance and best practice. The assessment approach focused on using a sequential approach with sites prioritised for assessment based on Local Plan spatial priorities and Green Belt assessment outcomes. Applying a sequential approach to the assessment of sites through the use of major constraints, such as lower performing Green Belt sites as a means of sifting sites is considered to be consistent with national policy. • It is considered that the spatial options assessment process is consistent with paragraph 138 of the NPPF (now paragraph 142 in the Updated

Evidence Base - Site Selection Methodology	
Summary of Issues Raised	Response
<p>and what mitigation may be possible through landscape planting and buffers for instance. The same approach set out by the Council through the Implications of Green Belt Release Report (2021) should be adopted for potential alternative site allocations. It is considered the Council's site selection process falls short of what is required to ensure a fair and transparent site selection process that contributes to the emerging local plan overall vision and objectives. It is contrary to the PPG, which advises that all land should be assessed together as part of plan preparation to identify which sites are the most suitable and deliverable for a particular use (paragraph 3-001).</p>	<p>NPPF 2021) as it gave consideration to land which has been previously-developed and/or is well-served by public transport in the first instance.</p> <ul style="list-style-type: none"> • Fiddlers Ferry represents a significant brownfield regeneration opportunity of which the release of Green Belt is an enabling component.
<ul style="list-style-type: none"> • Promoters of a site excluded from the Updated PSVLP consider that the Council has selected strategic sites for allocation at SEWUE, Warrington Waterfront and Thelwall Heys for residential development through reliance on a very limited evidence base. They reason that the Council should commission a full environmental and technical evidence base in relation to these sites to enable their relative merits and sustainability to be assessed and compared on a fair and equal basis with other reasonable development options. They Peel fundamentally disagree with the conclusions reached by the Council with respect to the relative sustainability of the different options which is influential in determining which forms the basis of the Local Plan. 	<ul style="list-style-type: none"> • In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The sites were assessed in detail against a consistent set of criteria relating to performance against the Plan's objectives and SA/SEA site assessment criteria to establish that the suitability of sites. • The Council has also undertaken a detailed assessment of infrastructure required to deliver these allocations and assessed each of the allocations through its Local Plan Viability Assessment.
<ul style="list-style-type: none"> • The owner of Port Warrington and the land for the associated commercial park considers that the specialist justification and need for an expanded Port Warrington to Peel Ports is not reflected in any the Plan's revised evidence base, including the Development Options and Site Assessment Technical Report. Paragraph 106 of the NPPF requires planning policies should provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. Further, the options assessment 	<ul style="list-style-type: none"> • Although proposed to be allocated in the previous PSVLP 2019, extending the Port will result in loss of part of Moore Nature Reserve and there are significant concerns regarding the potential impact on the Western Link. • In particular, to mitigate the impact on the Western Link it is likely that significant additional capacity will need to be provided at the junctions of the Western Link and the A57 and the A56. The scale of improvements required to these junctions is likely to raise significant engineering, deliverability and viability issues.

Evidence Base - Site Selection Methodology	
Summary of Issues Raised	Response
<p>process has overstated the ecological impacts of the loss of part of Moore Nature Reserve and the potential impact on the Western Link and evidence has been submitted to demonstrate that these impacts can be mitigated.</p>	<ul style="list-style-type: none"> • The Council is however committed to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. By this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.
Statutory Consultees	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •
Other	
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> •

Evidence Base - Sustainability Appraisal (SA)	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> In the Updated Proposed Submission Version Local Plan there appears to be no discussion in the Sustainability Appraisal of a lower growth scenario when proposing policies relating to the growth target. 	<ul style="list-style-type: none"> Lower growth scenarios have been considered through the SA at earlier stages of the plan making process, including at Preferred Options and the Regulation 19 (2019) stage. However, it has been concluded that these options were not able to adequately meet the Borough's needs and the Council is confident that the level of growth identified in the UPSVLP is appropriate and justified.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> None. 	
Landowner/Developer	
<ul style="list-style-type: none"> The SA does not address the need for or sites suitable to meet the need of a motoway service area. 	<ul style="list-style-type: none"> There is no specific requirement for the Local Plan to make provision for a Motorway Service Area.
<ul style="list-style-type: none"> The SA overly emphasises the impact upon the ability to extract minerals despite it being recognised that some areas have already been sterilised in this regard by existing development. 	<ul style="list-style-type: none"> This point has been taken into consideration in individual site assessment proformas.
<ul style="list-style-type: none"> The impact of development at Fiddlers Ferry has not been accurately assessed in the SA with the effects underplayed. 	<ul style="list-style-type: none"> The Council is confident that the SA assesses the full impacts of development at Fiddlers Ferry and the conclusions drawn are accurate and appropriate.
<ul style="list-style-type: none"> The SA overplays the impact of the South West Urban Extension, in particular in relation to Air Quality. 	<ul style="list-style-type: none"> The Council is confident that the conclusions drawn in relation to the South West Urban Extension are accurate and appropriate.
<ul style="list-style-type: none"> The specialist justification and need for an expanded Port Warrington is not reflected in any of the Plan's revised evidence base, including the Plan's Sustainability Appraisal. 	<ul style="list-style-type: none"> The Council is confident that the SA has adequately considered the options for development and this has been carried through to supporting local plan evidence base documents as well as the plan itself.
Statutory Consultees	
<ul style="list-style-type: none"> None. 	
Other	
<ul style="list-style-type: none"> Our Green Warrington - There has been no impact assessment at the sites of the ASNW (Ancient Semi-Natural Woodland). The Sustainability Appraisal refers to these sites only as "mature woodland", not ASNW, which is misleading. 	<ul style="list-style-type: none"> The Council is confident that impact on all areas of protected and important woodland have been fully assessed.

Evidence Base - Urban Capacity Assessment	
Summary of Issues Raised	Response
<i>Residents</i>	
• None.	•
<i>MP, Borough Councillor, Town or Parish Councillor / Council</i>	
• None.	•
<i>Landowner/Developer</i>	
<ul style="list-style-type: none"> • The majority of developers consider that the Plan is based upon unduly optimistic assumptions about the delivery of a substantial number of homes on brownfield sites as set out through the SHLAA, with particular concerns raised regarding sites in the town centre and Inner Warrington, given the Council’s own viability assessment identifies significant viability challenges for these sites and whether higher density homes on these sites will meet Warrington’s needs for family homes. The Council has also been criticised for not updating its SHLAA for 2021 and not fully detailing its urban capacity calculation. 	<ul style="list-style-type: none"> • The NPPF requires the Council to make as much use as possible of suitable brownfield sites and underutilised land (para 137.a). To ensure it meets this requirement, in preparing the Updated PSVLP (2021), the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional masterplanning work in the town centre and surrounding area to identify additional brownfield capacity. This masterplanning work was incorporated into the SHLAA, enabling each site to be assessed in terms of availability and deliverability. • The Council acknowledges that it had not clearly identified all of the sites which formed its urban capacity figure. Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. This has resulted in a marginal decrease in urban capacity which is not material to the Plan’s overall land supply position. • The Council has also produced an addendum to its Local Plan Viability Assessment which provides additional detail to demonstrate the viability of different types and sizes of development across the borough, including those in the town centre and inner Warrington. The Council is confident these sites will come forward and will compliment suburban and Green

Evidence Base - Urban Capacity Assessment	
Summary of Issues Raised	Response
	Belt release sites which together will provide a wide range of housing types to meet Warrington's needs.
<ul style="list-style-type: none"> There are concerns around a number of assumptions in the SHLAA - in respect of build rates, density, net site area and lead in times - which are considered too ambitious. Developers also do not believe there is sufficient evidence in the SHLAA that sites in the 5 year land supply without planning permission meet the more rigorous deliverability criteria set out in Annex 2 of the revised NPPF. 	<ul style="list-style-type: none"> The SHLAA and master planning work that the Council has undertaken was updated following the PDO consultation and the previous Proposed Submission Version Local Plan consultation, taking into account relevant representations. The capacities and build rates of the large sites are in the majority of cases informed by information provided by the developers of the sites in the first instance and only if it is not possible to obtain any details are the standard assumptions applied. The assumptions in the SHLAA (Build Rates; Lead-in-times; Densities etc) are based on local evidence and are re-appraised annually to ensure that they are up-to-date and take account of recent fluctuations in market conditions. Following consultation on the Updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF (including the deliverability criteria set out in Annex 2) and to update timescales for their delivery.
Statutory Consultees	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">
Other	
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none">

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
Residents	
<ul style="list-style-type: none"> • SHLAA underestimates number of new dwellings available from brownfield sites. Stated urban capacity is not supported by evidence and underestimates available housing. 	<ul style="list-style-type: none"> • In preparing the Updated PSVLP, the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Available Assessment (SHLAA) and its Brownfield Register, both of which are updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity, which was incorporated into the SHLAA. • Following consultation on the updated PSVLP (2021), the Council has updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land.
<ul style="list-style-type: none"> • The 'new' standard method imposed by central government continues to use the 2014-based household projections, which are out of date and do not take into account the latest population projections and therefore development needs are overestimated. 	<ul style="list-style-type: none"> • The Council has used the 2014 Based Household Projections to establish its minimum housing requirement in accordance with Government Planning Policy and associated Planning Practice Guidance.
MP, Borough Councillor, Town or Parish Councillor / Council	
<ul style="list-style-type: none"> • The LHNA seeks to establish justification for housing need based on aspirational growth rather than a realistic projection of historic trends. 	<ul style="list-style-type: none"> • The Council has established its housing requirement based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the higher housing target in the previous PSVLP 2019. The Council is not proposing an additional uplift to the housing

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
	<p>requirement, as was the case with the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID.</p> <ul style="list-style-type: none"> • The Council considers the revised housing requirement is ambitious but achievable. The Council acknowledges the recent relatively low level of housing completions. However, when considered over a 20 year period, Warrington's average housing completion rate is 725 homes per annum. There have been 4 consecutive years where completions were above 1,000 per annum during the mid-2000s, with a peak of 1,565 in 2007/8. It should also be noted that the Council's housing target was only 380 per annum up to 2014. The Council's housing trajectory projects an increase in completions over the short term, with a number of sites either under construction or with planning permission. The proposals in the Plan will establish a housing land supply to support the Plan's housing requirement over the Plan period as a whole.
Landowner/Developer	
<ul style="list-style-type: none"> • Local Housing Needs Assessment (2021) does not provide sufficient evidence to justify the policy requirements in policy DEV2 for optional standards for accessible and adaptable homes. 	<ul style="list-style-type: none"> • The Council has prepared its LHNA and justified the associated policy requirements for accessibility standards, in accordance with the requirements of the NPPF and associated Planning Practice Guidance. The updated Proposed Submission Version Local Plan is seeking all homes to meet standard M4(2) (accessible and adaptable dwellings) with 10% required to meet standard M4(3) (wheelchair user dwellings). This is subject to viability and technical feasibility considerations. The Council has ensured that the costs of meeting these standards have been accounted for in the Local Plan Viability Assessment.
<ul style="list-style-type: none"> • Support for the Council's ambitious economic plans however housing growth is not aligned with this. The LHNA (2021) has not assessed housing need based on historic take up rates and instead uses unreliable labour demand forecast. 	<ul style="list-style-type: none"> • The previous PSVLP 2019 housing target included an uplift to ensure the number of homes being planned matched the number of jobs anticipated to be created through the Council's economic aspirations, as reflected in the Local Enterprise Partnerships Strategic Economic Plan. Through the update of the EDNA (2021), the Council no longer considers this scale of

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
	<p>jobs growth to be realistic and is confident that a housing target of 816 – in line with the Government’s housing methodology - will result in an increase in working age population sufficient to support the number of additional jobs that are likely to be created in Warrington over the Plan Period.</p> <ul style="list-style-type: none"> • It is not possible to align jobs targets, based on forecasts which also inform the UPSVLP housing target, with the employment land target, which is based on a forward projection of past take up. This is because businesses will seek to grow their operations, generating needs for premises and land, for a range of reasons, many of which are unrelated to the number of people they employ. • It is also not viable to project forward past jobs growth as a method of forecasting future employment growth and, from that, housing needs. Changing working practices and an evolving economy mean that employment trends of the future will differ from those of the past. • The Council’s position is re-enforced through the EDNA Addendum (2022) prepared in response to key issues raised from the Updated PSVLP consultation. • The Council is therefore confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government’s methodology will meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt compared to the target in the previous PSVLP 2019. The Council is also confident that it has correctly established its objectively assessed need for employment land and that overall the Plan provides a balanced strategy for meeting Warrington’s future housing and employment land needs.
Statutory Consultees	
• None	
Other	

Evidence Base - Local Housing Needs Assessment	
Summary of Issues Raised	Response
<ul style="list-style-type: none"> • The growth predictions are unsound coming from the Local Enterprise Partnership and there is no sound evidence to back up the predictions. The use of older 2014 economic/house projection data and a formula recommended by the Government is only loosely justified so there's not enough confidence in the accompanying evidence base concerning the Council's housing forecast. 	<ul style="list-style-type: none"> • The Council has established its housing and employment land requirements based on a comprehensive assessment of future development needs. The Council is confident that setting the housing requirement of the Plan to the minimum housing need figure under the Government's methodology will meet Warrington's future housing needs and support its continued economic growth, whilst minimising the impact on the Borough's Green Belt compared to the higher housing target in the previous PSVLP 2019. The Council is not proposing an additional uplift to the housing requirement, as was the case with the previous PSVLP 2019, having considered the most up-to-date economic context, including the impacts of COVID.