

From: [Local plan web form](#) on behalf of [Main modifications consultation](#)
To: [Local Plan](#)
Subject: Local plan main modifications consultation
Date: 23 April 2023 17:57:01

Submitted on Sun, 23/04/2023 - 17:36

Submitted values are:

Your information

Your name

Mark Aylward

Organisation (if applicable)

AYLWARD TOWN PLANNING LTD

Address

[REDACTED]

Phone number

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Modification response

Which main modification or consultation are you responding on?

MM017 Part 4

Is the main modification legally compliant?

Yes

Is the main modification sound?

No

Why do you consider it is not sound (max 2000 words)

As we set out in our prior evidence to the Reg 19, we suggested that the policy should only be applied to those typologies which had been properly tested. This excluded retail park typologies (for example) and despite highlighting this lacuna, no such amendment or any justification has been provided.

Without the amendment or justification material to consider common development typologies, the policy remains unsound.

Detailed response and document upload

Detailed response to main modification (A maximum of 5000 words, which equates to roughly 10 sides of A4 paper)

The policy seeks to impose policy obligations which would be more onerous than those which have informed the development of existing buildings in Warrington. In accordance with standard good practice, the Council's viability evidence provides analysis of a range of development typologies in terms of the impact of the "policy on" approach which has been sought. This seeks to demonstrate that the additional policy obligations will have no adverse effect on deliverability of Plan-led requirements or otherwise acceptable development.

Whilst we agree that it is not practicable to assess every potential development through a high-level viability analysis, the structure of the policy provides no mechanism for consideration of viability for either abnormal developments or any typologies which have not been assessed. Specifically, the viability appraisal has had no regard to retail park typologies and these cannot be considered to be particularly unusual or unlikely to be the subject of DM activity.

As we set out in our prior evidence to the Reg 19, we suggested that if the policy was to be applied on a blanket basis then it should only be applied to those typologies which had been properly tested. No such amendment or any justification has been provided, nor has any reference to a mechanism for the consideration of why such an approach would impede deliverability.

Without the amendment or justification material to consider these eminently common development typologies, the policy remains unsound.