

Local Plan, Planning Policy and Programmes,
Growth Directorate,
Warrington Borough Council,
East annexe,
Town Hall,
Sankey Street,
Warrington WA1 1HU

Tel/fax: 01606 835046
info@cprecheshire.org.uk
www.cprecheshire.org.uk

*Working locally and
nationally for a beautiful
and living countryside*

By email: localplan@warrington.gov.uk

15th November 2021

Dear Local Plan Team,

I am writing a response on behalf of the Campaign to Protect Rural England's (CPRE) Cheshire (herein CPRE) in response to the **Warrington Proposed Submission Local Plan 2021-2038 Consultation**.

Below I introduce CPRE, The Countryside Charity and set out key rural issues of concern. In Appendix 1.0 *Policy response*, I set out recommended text amendments to improve the Local Plan in terms of better protecting and enhancing our rural areas and urban greenspace as development is planned in the future.

CPRE, The Countryside Charity

We are CPRE, the countryside charity. We want a thriving, beautiful countryside for everyone.

We believe in countryside and green spaces being accessible to all, rich in nature and playing a crucial role in responding to the climate emergency.

With CPRE group represented in every part of England, we're advocating nationwide for the kind of countryside we all want: one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before.

We stand for a countryside that enriches all our lives, regenerating our wellbeing, and that we in turn regenerate, protect and celebrate.

We've worked for almost a century to support and promote the countryside, and we'll be doing this for generations to come. That's why we call ourselves 'the countryside charity'.

We are members of the 'Smart Growth Coalition' as well as the Rural Coalition. A key part of our vision is a low carbon countryside that mitigates and adapts to the impacts of climate emergency and tackles air pollution.

We acknowledge the hard work of the Warrington Local Plan Team and are pleased that many of the concerns that CPRE and local communities across Warrington have raised at earlier consultations

stages have been heard, with associated refinement to the proposed policy wording and land allocations.

CPRE key issues

Enhance Our Environment

When considered in entirety, it appears that economic factors take priority over social and environmental ones and therefore the local plan is imbalanced. This is out of kilter with the NPPF. There are some outstanding countryside and open greenspace concerns to be addressed.

Carbon Zero

CPRE recommends that carbon zero/neutral development should feature more strongly throughout the document as it is the most pressing planning and investment priority for all future spatial plans, and currently there is barely any reference within the 320 pages of the Warrington Submission Local Plan document. This is all the more evident when considering the COP-26 Summit in Glasgow where 200 nations are grappling with the climate and biodiversity emergency.

Without some further adjustments, it will not support the national ambitions on carbon-neutrality, or the more ambitious local target of becoming carbon neutral by 2030. There has been an appalling track record at the international, national and local level and this must change.

Ecology

The Borough has a large number of ecological assets (55 Local Wildlife Sites, 4 Local Nature Reserves, 4 Sites of Special Scientific Interest (SSSIs) and 3 Special Areas of Conservations (SACs)), which contribute to Warrington's identity and character. CPRE hopes that the Local Plan will protect and enhance such assets in the future.

Brownfield

CPRE champions the reuse of the significant brownfield land resources in advance of our greenfields. We echo the Government's requirement of local authorities to encourage developers to use brownfield land as a priority in the National Planning Policy Framework (NPPF), July 2012 Section 11: *Making effective use of land*. CPRE urges for a brownfield preference approach, as neighbouring Greater Manchester Combined Authority is pursuing.

We applaud that the Fiddler's Ferry site is now included in the Plan, since the closure of the power station in spring 2020 in accordance with Government's aim of closing all coal-fired powers stations by 2025.

Green Belt

We welcome that the Submission Local Plan has more than halved the amount of land for Green Belt release (previously 1,210 hectares proposed in the previous Plan, which equated to 11% of the total amount of Green Belt). The amount of land in the Green Belt proposed for development is 580 hectares. This still equates to some 5% of Green Belt land in the borough. See Extract from the Warrington Local Plan 2021 Policies Map.

'Genuinely' affordable housing

There is a significant shortfall of affordable homes within the Borough that needs to be addressed by the Local Plan. Current housing delivery, particularly on greenfield is not genuinely affordable as

developers seek permission for larger family and executive homes in more affluent rural places. We also consider it is also important for rural places to have more 'genuinely' affordable homes, meaning in perpetuity low-cost social housing.

Landscape Character

Warrington has a varied landscape character (20 defined landscapes in the Landscape Character Assessment), important areas of nature conservation value and extensive areas of high-grade agricultural land. It is important the landscape character is fully considered when deciding on future development.

Amenity

Air quality is poor in some areas and transport is a key contributor linked to Warrington's location on the Strategic Highway Network and road based transport, particularly HGVs. More needs to be done to move freight onto rail to tackle air pollution. It is important to ensure the quality of life of people who reside, work and visit the borough is enhanced through careful strategic land use planning.

Allocations

We acknowledge the removal of some of the previous Green Belt allocation sites, including Port Warrington and the Business Hub, and the residential allocations at the South West Urban Extension (1,600 homes), Phipps Lane in Burtonwood Village (160 homes), and Massey Brook Lane in Lymm (60 homes) from the Plan.

Garden Suburb

CPRE is not anti-garden suburbs per se. We see that if justified a large strategic sustainable urban extension can benefit from master planning and economies of scale that reduce the amount of rural land urbanised and it can also secure high quality design. We note that the Council has moved away from the Garden Suburb concept in South Warrington (4,200 new homes in the plan period), and instead including new proposals for a South East Warrington Urban Extension, with a reduced allocation of 2,400 new homes during the plan period. The key concern is whether there is a justification and CPRE argues there is not.

Sustainable Transport

Warrington is too road dependent with traffic congestion, accidents, poor air quality, high incidence of respiratory disease and other poor health indices. In the future more integrated transport infrastructure is required, with walking and cycling being prioritised and better enabled, along with public transport services such as bus and rail.

Summary

CPRE's aim is to ensure the Local Plan capitalises on opportunities to regenerate the urban cities and towns and in doing so, best protect and enhance the rural areas, Green Belt and urban greenspace of Warrington for everyone's benefit in the future. In Appendix 1.0: CPRE Policy & Allocation Response, I set out CPRE comments in response to the various sections of the Submission Local Plan document.

It is recognised that without a democratically adopted Local Plan the countryside and open greenspace across Warrington is more vulnerable to speculative development, so we do hope the policies and allocations are progressed to better steer future development to the most sustainable places without further delay.

We would like our representation to aid the examination and wish to take part as appropriate at the independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

Jackie Copley, MRTPI MA BA (Hons) PgCert

Planning Manager

Appendix 1.0 CPRE Policy & Allocation Response to the Warrington Submission Version Local Plan 2021-2038

Introduction

CPRE is broadly content with the Introduction.

Spatial Portrait

Warrington, designated a New Town in 1968, has become the largest urban area in Cheshire, at a strategic location between the conurbations of Liverpool City Region and Greater Manchester, surrounded by a rural hinterland. The Borough covers some 176 square kilometres and, at mid-year 2020, was estimated to have a population of 209,397, (49.6% male and 50.4% female) with 91,296 households (average size 2.34 people).

Aging demographic, low ethnic minority and high owner occupied tenure.

Recent strategic planning policies have sought to regenerate older urban areas and to tackle underuse and vacant previous developed land and maintain the distinct identity of the Borough's Countryside and smaller settlements. This is a legacy that CPRE considers important, and in the future the distinct rural character should continue to be protected and enhanced by the Local Plan. CPRE wishes the evidence for the following paragraph to be examined more fully as it is considered there are sites available for development on the Brownfield Register, and also some sites that have been classed 'unsuitable' to go on the Brownfield Register that should have some prospect of being developed during the plan period.

2.1.12 There is a recognition that the previous focus on using brownfield land to meet the towns housing and employment needs has now meant that Warrington is now running out of such land and supply is dwindling. The town is also encountering housing affordability issues, with this being a particular problem for younger people and young families.

It is of concern how rapidly the countryside around Warrington has been urbanised as illustrated in Figure 1.

At the Call-In Inquiry for the recently approved Omega expansion proposals, CPRE objected due to concern that logistics is of low value and that the harms arising compared to the benefits cited lead to a negative planning balance. The density of very large-scale logistics shed is very low and is subject to increasing automation. Also, in terms of worklessness, there is no ring-fencing of jobs to the Warrington area. Drivers can live anywhere, and since Brexit there has been a crippling shortage of drivers, with associated negative impacts on business and supply and customer chains, seeing manufacturers unable to make products and retail shelves left empty. There are other speculative applications elsewhere in the area and in neighbouring geographies that were the subject of Secretary of State decisions. Parkside road-based logistics and link road applications have been approved and Haydock Point refused.

CPRE notes the improvement in terms of Indices of Multiple Deprivation.

In terms of health and well-being it is noted that a significant percentage of the Borough's Super Output Areas rank amongst the worst nationally. CPRE would like to highlight the value of local greenspace for recreation and leisure and health and well-being benefits. CPRE undertook research with the Women's Institute during lockdown in 2020 and found that the real benefits of precious green spaces are clearer than ever, with over half of survey respondent saying that lockdown has made them more aware of the importance of these local green spaces for mental health and

wellbeing. And our lovely parks and green areas (including Green Belts, the 'countryside next door' for so many of us) are getting extra love and footfall in these strange times, with more than a third of us visiting them since the start of lockdown.

2.1.35 The supply of new homes remained relatively buoyant with significant levels of new homes delivered up to the height of the last development boom in the mid-2000s. Local monitoring over this period confirmed that 99% of new homes had been delivered on previously developed land and that a healthy mixture of dwellings in terms of type and size had been delivered.

If this is the case CPRE questions why the Local Plan cannot be more ambitious on delivery of new homes on brownfield in the future. Brownfield should not be considered exhausted with more property obsolescence to be considered in the future. Windfall contribution is likely to be higher over the life of the local plan and there is therefore not the justification to allocate greenfield land unnecessarily.

Vision – Warrington 2038 and beyond

When considered the vision appears to prioritise economic factors over social and environmental ones and therefore the local plan is imbalanced.

CPRE recommends that to remedy this it should prioritise the climate emergency given half of Warrington is expected to be underwater due to the adverse flooding impacts.

Improved biodiversity should also be more prominent in the vision due to the degradation of ecology in the past few decades.

An improved environment will best support Warrington's economic and housing ambitions. CPRE suggests a more succinct vision with a reordered bullet list.

Objectives

W1 – identified too many houses. Furthermore, we do not believe that 316.26 hectares of land is required to satisfy the economic development requirements.

W2 – CPRE agrees that Warrington's Green Belt should be protected, but it disagrees that Green Belt should be released.

W3 – Warrington should not undermine the role of the combined authority areas of Liverpool and Greater Manchester.

W4 – This should refer to integrated transport provision.

W5 – CPRE supports this objective.

W6 - CPRE supports this objective.

In the strategic objectives it should be made clearer that carbon zero is the absolute priority as it a widespread and substantial net gain in biodiversity must be sought across the whole Borough.

Strategic Planning Policies

Policies relating to Objective W1

DEV1 Housing Delivery

CPRE welcomes that there is a reduction in the number of houses required from 945 a year over 20 years, to 816 a year over a reduced plan period of 18 years (2021-2038 inclusive) and a reduced plan period. This, in turn, will mean a reduced need for Green Belt allocation. However, over the past three years only 468 dwelling per annum have been completed and the housing requirement is

almost double this. CPRE thinks the council is setting itself up to fail as the quantum is not supported as needed by the latest Office of National Statistic (ONS) population data. Despite the Government mandating it, it is not following its own best practice of using latest data to inform projections. There is a crucial dysfunction here leading to urbanisation of our countryside at an alarming rate. CPRE asks, what is the source of all the immigration? All local authorities are planning for growth simultaneously, yet the ONS data shows an aging population, so there is a flaw in the way housing requirements are calculated. It does not reflect reality.

Failure against the Government's stringent Housing Delivery Test will quickly find the local plan out of date, and more rural land will be lost to housing and associated urbanisation. We urge for a more reasonable housing requirement, a reduction in new housing. For more information, please see <https://www.cpre.org.uk/resources/set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside/>

We recommend a reduced amount of housing as 14,688 dwellings at 2.34 people per household equates to housing for an additional 34,370 persons or +16.4% of the existing population.

Also, housing numbers should be reduced for bullet 4. A minimum of 801 homes will be delivered on allocated sites to be removed from the Green Belt adjacent to following outlying settlements:

- a. Croft – minimum of 75 homes
- b. Culcheth – minimum of 200 homes
- c. Hollins Green – minimum of 90 homes
- d. Lymm – minimum of 306 homes
- e. Winwick – minimum of 130 homes

CPRE does not support these allocations and disagrees with land being taken out of the Green Belt, as not justified, but note that the density should be appropriate to the location and higher, as 30 dph seems to be excessively low.

Bullet 7 sets out a staged approach, which although CPRE supports, points to as evidence of the housing requirement being too high to reasonably satisfy during the plan period.

With a reduced housing requirement, the Council can be more reasonably be expected to maintain a 5-year supply of housing land.

The policy does not mention windfall sites (unanticipated land) and the contribution of small sites, yet recently windfall has come forward at Padgate Campus, Bank Quay and Fiddlers Ferry. 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.

DEV2 Meeting Warrington's Housing Needs

CPRE agrees more 'genuine' affordable housing is needed. We recommend 30% for Inner Warrington and elsewhere.

We recognise that the NPPF focus on viability has stopped affordable homes being delivered as developers renege out of agreed contributions due to NPPF loopholes. We continue to lobby Government for improvement of national policy. Sadly, these problem of the NPPF are outside the scope of the Local Plan examination.

CPRE believes that to be sound enough 'genuinely' affordable dwellings should be planned at a value that low paid wages can afford. The amount of affordable housing in rural areas is problematic as

property prices have risen eleven times more than wages in recent times. Covid is forecast to exacerbate the problem.

With 14,688 houses identified as required CPRE believes delivery of 4,406 additional affordable homes with at least 60% social rent across the local authority area.

In terms of housing mix CPRE recommends more smaller dwelling to better respond to the aging population and affordable housing shortages identified.

DEV3 Gypsy & Traveller and Travelling Show People Provision

CPRE supports the provision of enough land to accommodate the needs of this community.

DEV4 Economic Growth and Development

Economic development quantum identified in the Economic Development Needs Assessment (EDNA 2021), is considered overly ambitious when considering the reality of the economy.

CPRE recommends that there needs to be a Brexit and Covid sense-check of employment needs given so much property has been vacated. An understanding if the changes and whether they will last in the long term is important. Consideration of what land use the vacant property can be repurposed for is important.

Therefore, it is considered that the 316.26 hectares of land is too high for economic development requirements. We note an early review of the borough's employment land supply is sought by the Council and it can better understand the vacancy of a significant amount of commercial property at various scale and location.

We note the sites at Fiddlers Ferry, South East Warrington, Port Warrington, Warrington Commercial Park, and Land to the East of Junction 21 of the M6.

DEV5 Retail and Leisure Needs

Changes in retail due to technological advancement, Brexit and Covid are required to better understand the sharp increase in online shopping and working from home are likely to be permanent features, and consequently a precautionary approach is recommended.

Policies relating to Objective W2

GB1 Warrington's Green Belt

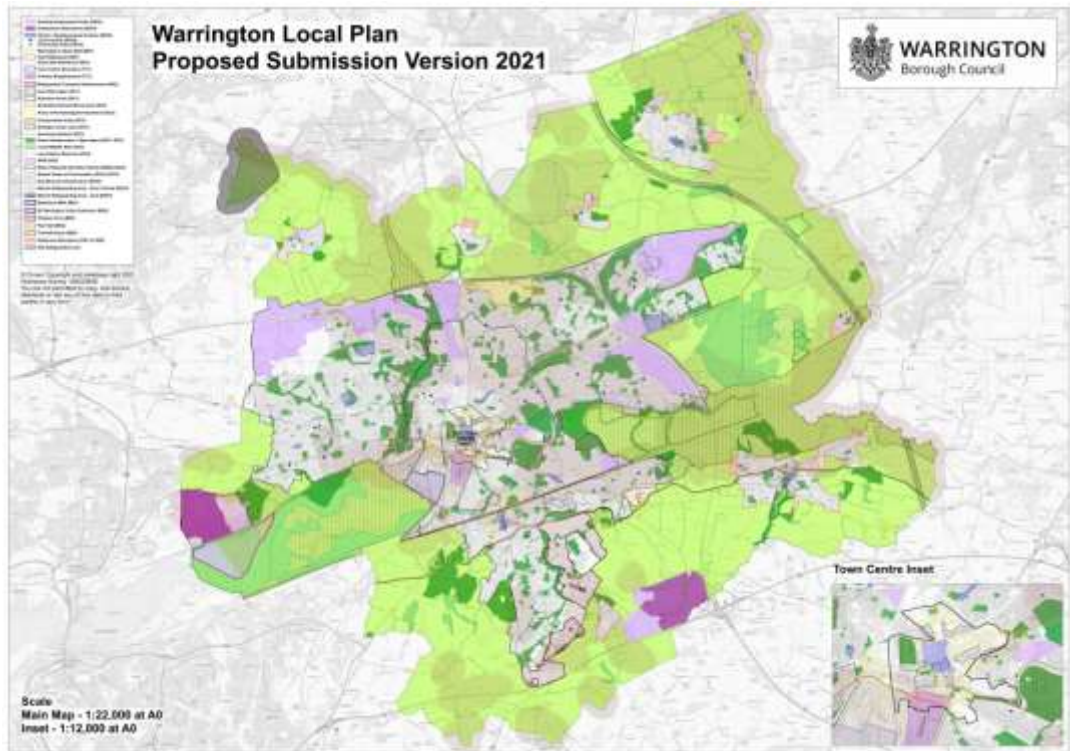
CPRE objects to the release of land in the Green Belt for development.

Warrington's Green Belt fulfils the key role of preserving openness permanently. There is also an important role in ensuring the separation of Warrington from neighbouring towns and cities and preventing urban sprawl and countryside encroachment.

CPRE has concern with the Green Belt Assessment that forms the local plan evidence base. Specifically CPRE objects to the release of Green Belt land at: a. South East Warrington Urban Extension; b. South East Warrington Employment Area; c. Land to the east and south of Fiddlers Ferry Power Station; d. Thelwall Heys; e. Land at Warrington Waterfront ;f. Land at Croft; g. Land at Culcheth; h. Land at Hollins Green; i. Land at Lymm; and, j. Land at Winwick.

In our view Green Belt release is unjustified and it could be avoided in entirety, if the high quantum of development identified is reality checked. Furthermore, if all alternative land is considered and

properly planned with appropriate density of development. We think there are more sites to be identified on the Council's Brownfield Register. Finally, 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. See an extract of the Local Plan 2021 Policies map.



Policies Relating to Objective W3

TC1 Town Centre and Surrounding Area

CPRE is broadly content with this policy. We welcome any enhancement of the Town Centre's Environment as set out under bullet 7.

Policies Relating to Objective W4

INF1 Sustainable Travel and Transport

Warrington is very poor in terms of its transport network and enabling walking and cycling due to its car domination.

The text in 1.a to 1j may therefore require editing to ensure the strategic road network is not prioritised for investment in advance of other modes. We recommend developments and developer contributions respond to improve public service provision. Deregulation has resulted in poor bus coverage, particular in rural areas that are known as Transport Deserts. In CPRE and the Campaign for Better Transport joint *2020 Transport deserts* report it is evident that some areas of England are already, or are at risk of becoming, 'transport deserts', with wildly insufficient local transport provision. [Transport deserts report: a summary - CPRE](#)

On HS2, the debate about the pros and cons will no doubt continue, but what is important now is for the Government to ensure a 'best in the class' approach to avoiding, mitigating, or compensating for the negative impacts on our countryside and communities. This includes the destruction of

irreplaceable habitats. That means the highest quality design delivered in a way that respects landscapes and habitats, as well as reducing its carbon footprint. CPRE have identified a few problems with the HS2 route through Warrington. For example the Golbourne Link is of no benefit to Warrington, with adverse environmental and local traffic impacts.

It is good that walking and cycling facilities are to be improved as new development comes forward. We recommend that the existing Public Rights of Way should be preserved and enhanced to improve public access to rural areas and the health and well-being benefits, particularly concerning obesity. It is a win/win/win for less carbon/cleaner air/healthier people via exercise.

Bullet 5 is crucial if more freight is to be taken off roads and put on rail to help reduce greenhouse gas emissions and tackle air pollution exceedance.

INF2 Transport Safeguarding

CPRE is concerned that more freight is transported on water and therefore no development should impede use of the Bridgewater and Manchester Ship Canals, the latter connecting to Liverpool Port.

INF3 Utilities and Telecommunications

No comment.

INF4 Community Facilities

CPRE is broadly supportive.

INF5 Delivering Infrastructure

CPRE is broadly supportive.

INF6 Aerodrome Safeguarding

CPRE has no comment.

Policies Relating to Objective W5

DC1 Warrington's Places

CPRE is broadly supportive of the policy, particularly points 8 to 10 concerning Countryside & Settlements

DC2 Historic Environment

CPRE is broadly supportive of the local plan enabling the Council through planning decisions to proactively manage and work with developers, the local community, and others to support proposals which conserve or, where appropriate, enhance the historic environment of Warrington.

There is important industrial heritage and railway history connected with the world's first commercial railway, the Chat Moss Line. The Local Plan needs to protect and enhance this in the local plan policy.

Some woodland, trees and hedgerows (Refer to the Hedgerow Regulations 1997) can have a historic significance as can Public Rights of Way. It is important that the historical and cultural value of both built and natural assets are captured properly when development decisions are taken.

DC3 Green Infrastructure

CPRE is supportive of the local plan having a strategic approach to the Green Infrastructure. We recommend inclusion of 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.

DC4 Ecological Network

CPRE is supportive of the purpose of DC4 Ecological Network as the Council should work with partners to conserve, restore and enhance biodiversity and secure a measurable net gain for biodiversity and enhance public access to nature across the Plan area.

The Mersey Valley Corridor from Fiddlers Ferry Power Station in the west, to Hollins Green and the flood plain for the River Bollin in the east contains a valuable mosaic of river valley habitats, notably wetlands, in the context of the Mersey Estuary as whole – one of the largest estuaries in Europe and supporting internationally important numbers of birds.

In September, CPRE released ground-breaking new research into hedgerows. Our report investigates the huge environmental and economic benefits of hedgerows and shows that boosting them by 40% would create 25,000 jobs over the next 30 years and yield almost £4 for every £1 invested. Local authorities can support community groups to plant more hedgerows while farmers can help by letting hedgerows grow taller and bushier. Warrington should have more policy reference to hedgerows as currently the only reference is to ten allocated sites.

Policy DC4 and other relevant policies could in CPRE's view more simply and precisely require all development to follow the harm avoidance, mitigation and compensation hierarchy set out in national policy (NPPF paragraph 180 a). It also needs to be made clearer that, in line with emerging statutory duties, development proposals in all locations will be expected to deliver or contribute to a net gain in biodiversity. These are important issues which should be addressed to make the Plan more effective. We echo the concerns for ecology and biodiversity raised by Cheshire Wildlife Trust.

DC5 Open Space, Sport and Recreation Provision

CPRE is broadly supportive. 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.

DC6 Quality of Place

CPRE is broadly supportive as it campaigns for good design and layout to ensure sustainable development is integrated into development. We think the policy should refer to latest best practice and guidance and accord with Birkbeck D and Kruczkowski S et al (2020) Building for a Healthy Life.

CPRE recommends an improved policy wording for landscape character protection and enhancement in the future. Landscape is more than just 'the view'. It's the ever-changing relationship between people, place and nature. The landscapes have a vital role in tackling the climate emergency by capturing carbon, cleaning the air, helping to slow flood waters and providing habitats for wildlife. Opportunities must be taken to enhance their function and value, including improving connections across the Green Infrastructure network. In Warrington the strategic green corridors include the Mersey Valley and Sankey Valley Linear Park, from which a series of other links can be accessed. Sankey Valley provides leisure and recreation opportunities along with active travel modes.

CPRE works nationally and locally for a positive future for all landscapes. We want to see thriving, landscapes that are more resilient to climate change by planting more hedgerows and trees, enhancing the qualities that make a place special. And we want as many people as possible to access these landscapes and enjoy their benefits to our wellbeing.

Important legacy of heritage assets are scattered across the borough with 379 Listed Buildings and 16 Conservation Areas, together with a large number of other buildings and structures of interest that are included on a local list. The Borough also contains 12 Scheduled Ancient Monuments, 1 Registered Battlefield and a wealth of archaeological remains. The Local Plan must protect and enhance the borough's heritage assets.

Policies Relating to Objective W6

ENV1 Waste Management

CPRE supports the sustainable use of a waste hierarchy to reduce, reuse and recycle to minimise waste.

For bullet 6 and restoration it is important that rural land is returned to the same or better condition and that it is no considered previously developed.

ENV2 Flood Risk and Water Management

Warrington is built on the floodplain of the River Mersey and is at risk of flooding from a range of sources such as the watercourses, run-off, canals and reservoirs. 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. This includes not over developing land that is results in an increase of surface run-off.

Many of the government's nature-based solutions to the climate emergency to date have focused on trees, but hedgerows are also crucial in soaking up carbon, protecting against flooding and aiding nature's recovery.

Maps modelling future scenarios show much of Warrington under water. See an extract from [COP26: The parts of the North West that could be underwater in less than 10 years - Manchester Evening News](#) where red shows areas to be flooded by 2030. This issue must be taken seriously.



ENV3 Safeguarding of Minerals Resources

CPRE notes the safeguarding areas on the map at Figure 15.

ENV4 Primary Extraction of Minerals

No comment.

ENV5 Energy Minerals

CPRE strongly objects to the exploration of hydrocarbons as all fossil fuel must remain in the ground to fulfil the nation's international commitments on Climate Change. CPRE proved to the Oil and Gas Authority that the current regulation of fracking is not fit for purpose, which in addition to seismic events due to operations elsewhere, lead to the moratorium on shale gas development as it is considered unsafe.

We are pleased to see peat resources will be protected. The wording of the policy may be improved by saying no development in peat will be permitted in accordance with the areas shown in Figure 16.

ENV6 Restoration and Aftercare of Mineral and Waste Sites

The policy is deficient in ensuring land in rural areas should be left in an improved condition and not considered as previously developed.

ENV7 Renewable and Low Carbon Energy Development

CPRE is broadly supportive of the policy.

The character of the landscape should be a key consideration when identifying the location of renewable and low carbon energy development. Issues such as tranquillity should be considered. Citing of renewable energy development should not harm rural landscapes that are otherwise unbuilt.

Electric vehicle infrastructure should be supported by the local plan as many more people are wishing to decarbonise their travel and are switching to electric or plug-in hybrid vehicles.

ENV8 Environmental and Amenity Protection

CPRE is broadly supportive. It is important air quality is improved to protect environmental and human health.

In addition to air and noise, CPRE wishes tranquillity to be specifically referred to. We welcome reference to avoiding light pollution, particularly in areas of relative dark skies. People ought to be able to see the stars in some areas of Warrington. Much of Warrington emits a light glow during dark periods making it difficult to clearly see the stars.

Site Allocations

Due to team capacity issues CPRE cannot provide detailed site comments on each allocation, but reserves the right to comment on the following allocations at the examination on topics where we have commented, such as Green Belt protection, ecology, best and most versatile land, development density, design, traffic management etc.

MD1 Warrington Waterfront

MD2 South East Warrington Urban Extension

MD3 Fiddlers Ferry

MD4 Peel Hall
MD5 Thelwall Heys
MD6 South East Warrington Employment Area
OS1 Croft
OS2 Culcheth
OS3 Hollins Green
OS4 Lymm – Pool Lane/Warrington Road
OS5 Lymm – Rushgreen Road
OS6 Winwick

M1 Monitoring and Review Policy

CPRE believes it is important that performance against local plan policy indicators as set out in Appendix 2 are captured in Annual Monitoring Report.

We think 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.

Understanding the proportion of housing and employment delivered on brownfield land is important. Across the country we have seen a reduction in the reuse of previously developed land since the introduction of the National Planning Policy Framework in 2012. It seems Regional Spatial Strategies that applied a brownfield target focused effort on reusing previously used land.

Despite Government promises to protect Green Belt, development on land previously in the Green Belt has risen by five times the amount.