



WARRINGTON
Borough Council

**Warrington Design Guide Supplementary Planning
Document**

**Planning Obligations Supplementary Planning
Document**

**Environmental Protection Supplementary Planning
Document**

Consultation Statement

July 2024

Introduction

This is the Consultation Statement for the Warrington Design Guide Supplementary Planning Document, the Planning Obligations Supplementary Planning Document and the Environmental Protection Supplementary Planning Document (SPD). It has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

The previous Consultation Statements that accompanied the Draft SPDs consultation documents are available to view on the Council's web site:

[Supplementary planning documents consultation | warrington.gov.uk](http://warrington.gov.uk)

The Town and Country Planning (Local Planning) (England) Regulations (2012)

Before adoption of an SPD, Regulation 12 (a) requires a Local Planning Authority to prepare a Statement setting out:

- who has been consulted while preparing the SPD;
- a summary of the main issues raised; and
- how these issues have been addressed in the SPD.

Statement of Community Involvement (SCI)

The Council's SCI was updated in December 2020. It outlines how the Council will consult and involve people in the preparation of Local Plans and other planning documents, such as SPDs. Alongside meeting the consultation requirements of the Regulations, consultations on the SPDs were carried out in line with the principles of the Council's adopted SCI.

Consultation Undertaken in Preparing the Draft SPDs

During the preparation stages of the Draft SPDs the Council undertook focused consultation with key stakeholders and partners to ensure the proposed scope and contents of the SPDs were appropriate to inform the contents of the draft SPDs that were published for formal consultation.

Focused preparation consultation included:

- WBC Internal Officers across a range of services, including Development Management, Environmental Protection, Transportation; Education; Housing, Public Health, Flood Risk and Drainage, Cultural Partnerships, Operations & Commercial Services; Climate Change & Sustainability.
- Greater Manchester Ecology Unit (The Council's ecological consultants)
- NHS Cheshire and Merseyside
- Natural England, Historic England and the Environment Agency (in the context of the SA/SEA/HRA Screening Statement)
- NHS Property Services (on the Planning Obligations SPD)
- Natural England and Greater Manchester Combined Authority (on the Holcroft Moss Section of the Planning Obligations SPD)

- Warrington Air Quality Management Board Members (on the Environmental Protection SPD)
- Places Matter North West - Design Review Panel (on the Design Guide SPD)
- Warrington Disability Partnership (on the Design Guide SPD)
- Warrington Climate Change Commission (On the Design Guide SPD)
- Cheshire Constabulary (on the Design Guide SPD and Planning Obligations SPD)

In response to the focussed consultation undertaken during preparation stages of the SPDs, the Council revised the structure and scope of the SPDs and made a number of refinements to the SPDs before going out to formal consultation. These revisions and refinements were to ensure the SPDs were effective in addressing issues raised by respective services and stakeholders and to ensure the document was presented in a clear, concise and transparent manner.

It should be noted that the Council also took into account relevant representations made to the Draft Regulation 19 Local Plan consultation (2021), when developing the Draft SPDs for consultation.

Consultation Undertaken on the Draft SPDs

The Council undertook a formal eight-week public consultation on the Draft SPDs, where representations on the Draft SPDs were invited and accepted by the Council. Consultation commenced on 13th December 2023 and ended on 07th February 2024 at 5.00pm.

As part of the formal consultation the Council consulted widely with the following:

- Residents, organisations and other stakeholders registered on the Local Planning Framework Database
- Parish and Town Councils
- Elected Members
- Statutory Consultees
- Neighbouring Local Planning Authorities

Availability of Consultation Documents

During the consultation period the Draft SPDs and supporting documentation were available to view on the Council's website at:

<https://www.warrington.gov.uk/supplementary-planning-documents>

They were also available to view electronically and in hard paper format at the Council's Principal Office, 1 Time Square, Warrington, WA1 2NT, during normal office hours (Monday to Friday 9.00am to 5.00pm) and at each of the Council's Libraries.

<https://livewirewarrington.co.uk/library/our-libraries/#1628598165876-197d1c1d-1d06>

Consultation representations were accepted by the Council as either a posted written representation, an email representation or by way of a Council standard response form representation; submitted via post or email.

An editable standard consultation response form was provided on the Council's web site and hard copies were available up on request from the Council by using the telephone, written and email details set out in the consultation literature.

Summary of Main issues raised during consultation and how they have been addressed

During the consultation period the Council received representations from 35 separate respondents. From the 35 respondents (the majority of whom made multiple representations), 79 representations were made on the draft Planning Obligations SPD, 92 representations on the draft Warrington Design Guide SPD and 21 representations on the Environmental Protection SPD.

Following a review and consideration of the individual representations made by each of the respondents, where required, the final SPDs were amended to take in to account the representations received.

In response to representations from the Department for Education (DfE) to the Planning Obligations SPD, the Council considered it necessary to propose amendments relating to the education contributions the Council requires from new development. As these amendments may increase the level of contribution that developers are required to make, the Council took the decision to re-open consultation on the Education section of the Draft Planning Obligations SPD only. This additional consultation was carried out between the 10th May 2024 and the 7th June 2024. None of the other proposed amendments are of such significance to require further consultation.

The Council received representations from 7 separate respondents to the additional consultation. Representations were made by statutory consultees and developers.

A summary of the main issues raised by respondents, and how they have been addressed by the Council in preparing the final SPDs, are presented at Appendix 1 (Warrington Design Guide SPD), Appendix 2 (Planning Obligations SPD) and Appendix 3 (Environmental Protection SPD) of this statement.

It should be noted that Homes England submitted representations to the initial and additional consultations. Due to Cabinet Office guidance, a summary of their representations cannot be published during the pre-election period ahead of the General Election on 4th July. An addendum report, providing a summary of Homes England's representations, will be published immediately following the conclusion of the pre-election period and ahead of the Cabinet meeting.

Appendix 1: Warrington Design Guide SPD-Main issues and how they have been addressed

Respondent	Comment	Council Response
Barratt & David Wilson Homes (North West)	Update references to NPPF to latest publication (2023)	References to the NPPF have been updated.
Barratt & David Wilson Homes (North West)	Not supportive of the introduction of any onerous technical design requirements that aren't properly justified - keep updated on progress of WBC design code	The Design Guide provides important design principles which have been properly justified. The guide provides flexibility in terms of meeting the principles and is not considered overly onerous. More detail will be provided through the future Borough-wide Design Code.
Barratt & David Wilson Homes (North West)	Reference should be added to state that implementing green roofs and walls should be considered where it is appropriate and feasible. Measures should not be imposed which may compromise the overall design quality, legibility and character of a scheme.	No amendment - references to green roofs state that they should be 'considered' and this is not a requirement for all development. No need to expand on this.
Barratt & David Wilson Homes (North West)	Statement on pastiche and referencing existing character - does not consider that the existing built form of the area may demonstrate poor design quality and materiality. It should be reconsidered that developers can take inspiration from other well-designed schemes to create a 'pastiche' design	Text has been relocated and amended in 05.2.1 to explain that it may be appropriate to reference the prevailing character of the wider area or establish a distinct character if there is not sufficient built form to reference in the immediate area.
Barratt & David Wilson Homes (North West)	Point on SuDs expected on all sites should include "unless it has been demonstrated that it is not appropriate or feasible".	This is addressed within 3.1.4 / Integrating SuDs
Barratt & David Wilson Homes (North West)	Flexibility on street design promoted within the design guide could cause conflict in practice with Highways Officers' approach to highways design - requests that more clarification is provided on what WBC Highways are comfortable with adopting.	Clarification on technical standards to come through the future Borough-wide Design Code. Highways Officers have been closely engaged in the preparation of the Design Guide.
Barratt & David Wilson	Prescribed 21m frontage interface distances are rigid and prescriptive and do not accord with the guidance within Manual for streets. this principle doesn't seem to relate to	Wording has been clarified in 5.2.7 Principles for Homes to explain when flexibility in overlooking distances may be justifiable through

Homes (North West)	guidance on distances elsewhere in the SPD e.g. Section 04.2.3.3 (Shared Surfaces) where illustrations show interface distances evidently shorter than 21m - remove reference.	considered design. The image on 4.2.3.3 (shared surfaces) is in keeping with the guidance on overlooking distances.
Barratt & David Wilson Homes (North West)	Minimum garden depth should be 'preferred' minimum so that alternative depths can be justified on a site-by-site basis.	No amendment made. The minimum garden depth is fixed to ensure that acceptable levels of privacy are retained. This is consistent with guidance contained in the Council's House Extensions SPD (2021).
Barratt & David Wilson Homes (North West)	Lacks guidance on design of play spaces and SuDs basins.	This will be clarified in the Design Code, and the Council is awaiting changes to national legislation such as Schedule 3 of the Flood and Water Management Act 2010. The guide sets out the principles that these spaces should adhere to, pending technical guidance nationally and the Council's own future Borough wide-Design Code.
Barratt & David Wilson Homes (North West)	Point on centrally located landscape and playspace - statement does not consider that certain sites may benefit from existing natural assets to the development fringes. This statement should be caveated to state "where appropriate or applicable.	The example provided in section 5.3.1 is illustrative and shows an approach where a central play space is appropriate. Wording has been amended to reflect that this is to allow easy access from all properties. It is not a prescriptive requirement for all development and there are other layouts which will be able to meet the key design principles.
Barratt & David Wilson Homes (North West)	Point on sites lacking immediate built form for reference - conflicts with Section 03.1.3 where the SPD states it would not support schemes which are a pastiche or do not reflect existing character.	Text has been amended on 05.2.1 to explain that it may be appropriate to reference the prevailing character of the wider area, or establish a distinct character if there is not sufficient built form to reference in the immediate area.
Barratt & David Wilson Homes (North West)	SPD should refer to a threshold (i.e. number of dwellings or development size) where a site-specific Design Code will be required to provide clarity for developers.	The Design Guide has been updated to state that Design Codes will be expected for all major outline applications. For non-major outline applications, the Design and Access Statement should consider and reflect the process and principles of the design code guidance in appendix A.4.
Barratt & David Wilson Homes (North West)	Mixed parking approach could dominate street scene.	No amendment - this should not be the case providing boundary treatment and green buffering guidance is adhered to.
Barratt & David Wilson	The comment relating to the unacceptability of triple tandem parking at Page 72 contradicts previous guidance from WBC. Specifically, where a 3- or 4-bedroom dwelling has been	Triple tandem parking is unacceptable due to impracticalities of having to move 2 cars to access the 3 rd space, meaning the third space is unlikely to be used, increasing pressure on on-street parking.

Homes (North West)	proposed it has been previously acceptable for double tandem parking plus an additional garage space (i.e. triple tandem parking) to be built out.	
Barratt & David Wilson Homes (North West)	reference is made to a landscape buffer of a minimum of 1.5m wide being required every 5 spaces to avoid parking dominating the street scene. It is not clear how this specific measurement has been arrived at but BDW would welcome some flexibility for alternatives on a site-by-site basis.	The width has been determined to be an appropriate width for landscaping to establish and be maintained, whilst also being sufficiently sized to provide a clear visual break between car parking spaces. This has derived from site visits to historic developments where we observed smaller landscape strips which had not been maintained and did not provide an adequate visual break between spaces.
Barratt & David Wilson Homes (North West)	WBC should be satisfied that the guidance on parking within the SPD fully aligns with the requirements and expectations of WBC Highways Officers to avoid conflict / ambiguity as to what is acceptable	Thorough consultation with Highways Officers undertaken - no points of conflict.
Homes England and Miller Homes	Elaborate on the purpose and likely content of any potential future 'Site Specific Design Codes'.	Clarification has been provided in A.4 to confirm when Design Codes are required. The detailed content of a Design Code will be determined on a site-by-site basis.
Homes England and Miller Homes	Clarity needed on how borough wide design code would interact with codes produced by developers or alongside neighbourhood plans. Current content could confuse those engaging with strategic sites and a clearer set of definitions and expectations would be welcome	If neighbourhood plans and development frameworks / developer produced codes are consistent with principles of Design Guide / Local Plan, then there's no need for duplication, but there may still be elements of the Borough-Wide Design Code which apply e.g. highways adoptions standards. A.4 has been amended to clarify this.
Homes England and Miller Homes	Character areas not reflective of local plan - is Suburban Warrington meant to be treated as the remainder of the main urban area i.e. that outside of Inner Warrington?	Updated map within 2.1 / Warrington's Places clarifies the key character areas.
Homes England and Miller Homes	SEWUE does not sit within 'Suburban Warrington' - ref on p21 suggests most areas of Suburban Warrington are covered by Central 6 Masterplan - SEWUE should not be held to one particular character area.	The Central 6 Masterplan does not cover 'Suburban Warrington' and the reference to 'suburban Warrington' in section 2.3 / The Ambition has been amended to 'Inner Warrington' to address this. Within the adopted Local Plan, the SEWUE is within Warrington's 'suburban areas' DC1. However, the Design Guide does not supersede the requirements of the Local Plan allocation policy.

Homes England and Miller Homes	Keen to consider different and innovative solutions to waste storage - new places should not be designed around current prescriptive limitations eg refuse collection vehicle sizes - reflect in Design Guide.	The guidance reflects the Council's current practices for refuse collection. There may be opportunities for innovation but these would need to be demonstrated to be practical and affordable.
Peel and Peel NRE Acquisitions No.1	Greater clarity is required in the draft SPD as to when either a Development Framework or Design Code is required	The Design Guide has been updated to state that Design Codes will be expected for all major outline applications. For non-major outline applications, the Design and Access Statement should consider and reflect the process and principles of the design code guidance in appendix A.4.
Peel and Peel NRE Acquisitions No.1	Agree that the submission of any Design Code can be made with the first planning application if submitted in full. However, should the first application be made in outline, Peel considers it reasonable for the Design Code to be provided post-determination, and secured via planning condition.	To ensure the Design Code controls the final design of the scheme, the Council considers that it should be submitted with the outline application. The Design Guide has been updated to clarify that design codes are expected to be submitted to accompany all major outline applications.
Peel and Peel NRE Acquisitions No.1	Amend to provide greater clarity on the trigger for providing and agreeing Development Frameworks and Design Codes relative to planning applications.	The Design Guide has been updated to state that Design Codes will be expected for all major outline applications. For non-major outline applications, the Design and Access Statement should consider and reflect the process and principles of the design code guidance in appendix A.4.
Cllr Dr David Ellis	Consider strengthening wording 'consider' throughout	Reviewed and amended where possible within the scope of the document and to reflect the Local Plan. However, the Design Guide SPD cannot go beyond the Local Plan requirements and create new policy requirements. It is also important that the Design Guide allows for innovation in design, subject to meeting key design principles.
Cllr Dr David Ellis	Recommend new housing to have EV charging with bidirectional current flow - capable of both vehicle to grid and vehicle to home discharge of the battery	Reference to the Council's EV Strategy has been included at A1.1 - specific information on EV charging is contained within the Council's EV Strategy and accompanying planning document.
Cllr Dr David Ellis	Suggest a preference for low heat loss systems - Passivhaus/AECB CarbonLite Standard	Reference now included in section 5.2.6 / Principles for all typologies to consider using this technology.
Cllr Dr David Ellis	Ref albedo effect - suggest preference for paler coloured buildings to keep buildings cooler in summer	Reference has been added within section 5.2.2 / Principles for all typologies

Cllr Judith Wheeler	Stockton Heath Parish Council welcomes the opportunity to work with council on conservation area reappraisals - more guidance and stricter approach to planning needed for village	Comments duly noted.
Cllr Judith Wheeler	Stockton Heath Parish Council wish to be part of discussions around monitoring and mitigation regarding the South East Warrington Urban Extension.	The Council is committed to ensuring that the Parish Council, local community and all relevant stakeholders are engaged in the process of preparing the SEWUE development framework
Croft Parish Council	Document is very generic and unlikely to be much use in DM until the detailed design code is adopted.	Extensive consultation has been undertaken during the scoping and drafting stage with Development Management and other relevant internal services - their input has shaped the document to ensure it will be effective as a material consideration in the determination of planning applications. The Design Code will supplement technical standards, but the Design Guide sets out our design parameters and clearly communicates expectations for all applicants.
Croft Parish Council	Croft Parish Plan does not contain any local design analysis and guidance as suggested in draft SPD.	Reference to Croft Parish Plan has been amended.
Croft Parish Council	Croft Parish area and northern parishes have an identity distinct from the southern settlements - separate design guidance needed for both within design code	This will be addressed within the Borough-wide Design Code.
Croft Parish Council	Parish Council would like to actively engage with the Council in drafting elements related to the Parish Council area - in line with points on engagement	Comments duly noted and the Council will ensure the Parish Council is engaged in the preparation of the future Borough-wide Design Code.
Grappenhall and Thelwall Parish Council	Provide greater certainty that ambitions detailed in SPD will be used to inform development of designs and will be a consideration at application stage.	The Design Guide sets out the Council's expectations for the design of new development and will be used by developers from the outset of their development design process. As the Design Guide is an SPD, it will be a material consideration in the determination of planning applications.
Grappenhall and Thelwall Parish Council	Strengthen 'seek to' and 'consider' to 'expected to'	Reviewed and amended where possible within the scope of the document and to reflect the Local Plan. However, the Design Guide SPD cannot go beyond the Local Plan requirements and create new policy requirements. It is also important that the Design Guide allows for innovation in design, subject to meeting key design principles.

Grappenhall and Thelwall Parish Council	'Consider separation at source' is not strong enough in respect of dealing with waste as set out at A.3.	Amendments made under A.3 / General Principles to provide clearer guidance and more detail on this issue.
Grappenhall and Thelwall Parish Council	Greater emphasis on recycling needed	Reference to recycling is now made throughout section A.3 / Refuse guidance
Grappenhall and Thelwall Parish Council	Amend - 'Premises visited by the large numbers of the public, especially retail developments MUST provide community recycling facilities (glass, plastic or paper banks)'	This point has been removed as the Council do not currently operate local recycling banks outside of the Community Recycling Centres as recycling of glass, plastic and cardboard is readily available at home.
Grappenhall and Thelwall Parish Council	Amend to detail that design codes and development frameworks MUST be submitted with ALL large scale developments...any applications that do not provide an aspirational vision and quality design will be rejected'	The Design Guide has been updated to state that Design Codes will be expected for all major outline applications. For non-major outline applications, the Design and Access Statement should consider and reflect the process and principles of the design code guidance in appendix A.4.
Grappenhall and Thelwall Parish Council	SPD should give examples and illustrations of what is readily achievable in a new build with regards to addressing indoor air quality and ventilation	Reference to Indoor Air Quality Guidance: Assessment, Monitoring, Modelling and Mitigation added in A.5 / Additional information and resources has been added.
Brian Davies	Document lacks clarity that aspirations will be adhered to	The Design Guide sets out our design principles and expectations for future development. The Design Guide is supported by Policy and as an SPD will be effective as a material consideration in the determination of planning applications.
Brian Davies	Include points on insulation, renewable energy, maximising energy efficiency etc - low carbon construction is essential	Covered earlier in document by 'Healthy, happy places' under 'Site Ambition' which is applicable to all development (p29). No amendment made.
Brian Davies	'Consider separation at source' is not strong enough in respect of dealing with waste as set out at A.3.	Amendments made under A.3 / General Principles to provide clearer guidance and more detail on this issue.
Brian Davies	Greater emphasis on recycling needed	Reference to recycling is now made throughout section A.3 / Refuse guidance
Brian Davies	Amend - 'Premises visited by the large numbers of the public, especially retail developments MUST...'	This point has been removed as the Council do not currently operate local recycling banks outside of the Community Recycling Centres as recycling of glass, plastic and cardboard is readily available at home.
Brian Davies	Amend to detail that design codes and development frameworks MUST be submitted with ALL large scale	The Design Guide has been updated to state that Design Codes will be expected for all major outline applications. For non-major outline

	developments...any applications that do not provide an aspirational vision and quality design will be rejected'	applications, the Design and Access Statement should consider and reflect the process and principles of the design code guidance in appendix A.4.
Brian Davies	'give Warrington Borough Council comfort' should be 'to comply with Warrington Borough Council standards'	Wording in A.4.1 has been amended to '...to demonstrate compliance with the aspirational vision and to ensure quality design will be upheld during the detailed design phase.'
Jaqueline Johnson	Parking standards need overhauling given change to EV's and lack of reliable public transport - most important thing now is to avoid obstructive parking on roads and pavements but in doing this ensuring that front gardens still have unpaved areas for drainage. The existing standards are outdated	This will be addressed within the Borough-wide Design Code.
Jaqueline Johnson	Designs should minimise the excessive use of glass given the energy needed to both heat and cool buildings	This point has been added within section 5.2.2 / Principles for all typologies
Jaqueline Johnson	We need a fashion for verandas, car ports and canopies to prepare for the future	Overheating guidance within the Design Guide has been clarified at 5.2.2 to ensure that applicants consider the sunpath and orientation of buildings to minimise overheating. Amenity requirements are stated within the guidance.
Cheshire Brine Subsidence Compensation Board	Under 'integrating SuDs' it is noted that the use of SUDs should be considered at the outset, and integrated into the design proposals. Under “ Designing SUDS ”, the document states that SUDs can be implemented on all scales including strategic attenuation ponds and soakaway systems on larger development sites. It is important to note that the Board regularly sees the incorporation of soakaway / infiltration drainage within submitted designs and the Board does not usually accept the use of soakaway drainage as the introduction of freshwater into the underlying Halite / Rocksalt deposits can promote dissolution which in turn has the potential for ground instability to occur at the ground surface.	Comments duly noted. Reference to soakaway drainage has been removed.
Historic England	Document is clearly informed by an understanding of Warrington's built and natural environment and provides an easy to understand set of design principles. The requirement	Comments duly noted.

	for the design of new development to be informed by a sites context and positive aspects of local character comes through strongly in the draft design principles	
Historic England	Amend references to NPPF to latest publication (2023)	References to the NPPF have been updated.
Historic England	Support the key principles set out in the draft SPD, in particular the expectation for design quality on all sites and across all development sector	Comments duly noted.
Historic England	Would have been helpful if copy of baseline study was made available alongside draft SPD	Further information from the baseline study has been included in section 1 / The Ambition for Warrington.
Historic England	Not specific enough - see para 35 National Design Guide - As a minimum the document should highlight particular design elements that define local character and make Warrington a distinctive place, such as local history and cultural influences, materials, patterns of built form, landscape character, prevailing architectural styles and local vernacular	This will be addressed through the future Borough-Wide Design Code. In addition the Council has prepared heritage impact assessments for all site allocations in the Local Plan which provide a detailed assessment of heritage issues relating to these sites.
Historic England	Support the TC ambition	Comments duly noted.
Historic England	More could be said regarding distinctive qualities of conservation areas/need for development proposals to preserve or enhance special architectural or historic interest	This is addressed in the Council's Local Plan and will be further addressed through the future Borough-Wide Design Code. Additional context has been provided in section 2.
Historic England	Ref some of the conservation areas in rural settlements to highlight varied character between settlements	Reference added at 2.5.
Historic England	Support requirement for development proposals to be based on analysis of site characteristics - also welcome reference made to needing to consider existing guidance	Comments duly noted.
Historic England	Pleased with inclusion of 'leading with identity'	Comments duly noted.
Historic England	Foundational principle of understanding context and using it to inform the design of development is a clear theme throughout the document, and particularly the section on Appearance	Comments duly noted.

Historic England	Welcome the requirement for the scale and massing of apartment buildings to be informed by a detailed contextual analysis, and ref to further guidance in Town Centre SPD.	Comments duly noted.
Historic England	Welcome ref made to the need for Heritage Statements for all proposals with the potential to impact on heritage assets, this requirement should apply to all development proposals not just retrofit schemes. As such, it may be more appropriate to include this sentence under the principles for all typologies section of the document	Amendment made - reference to the need for Heritage Statements has been moved to section 3.1.1.
National Highways	We would encourage developments to focus less on private vehicle use, which can be somewhat achieved through restricting parking spaces, though this may lead to inappropriate parking in less desirable locations, such as verges.	This point is covered within A.1.1 / Future Trends.
National Highways	Encourage the promotion of lorry parking facilities within employment sites.	This point is covered within section 5.4.1 / Workplace
Natural England	Consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area - link to Green Infrastructure Framework: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx	This point is covered as a principle for all development under section 3.1.3 / Principles / Leading with landscape.
Natural England	Highlight importance of urban green infrastructure - there is opportunities to retrofit GI in urban environments	This point has been added to section 3.1.4 / Integrating SuDs and section 4.2.2 / Components.
Natural England	SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment	This point is covered within section 5.2.1 / Principles for all typologies.
Natural England	The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).	References are made throughout the document that developments must improve biodiversity. References to NPPF are also made

		throughout - to avoid duplicating wording from the NPPF and the Council's Local Plan, no amendments have been made.
NHS Property Services	SPD recognises the role planning can have in helping reduce public health inequality as well as how considered design choices can jointly benefit both health and mitigating climate impacts. For this reason, NHSPS supports the Warrington Design Guide SPD.	Comments duly noted.
Our Green Warrington	Images are uninspiring and should be more aspirational	Images throughout the Design Guide have been updated and improved with additional illustrations to convey design principles.
Our Green Warrington	How does WBC propose to measure / assess whether a new development has demonstrated an understanding of the existing context and heritage and how will WBC ensure that the resulting development does actually demonstrate such understanding?	Point added to 1.2 / How to realise the Ambition - "Applicants are encouraged to share analysis work and response to this design guidance at the pre-application stage". This includes the general approach, which covers heritage as well as other contextual issues.
Our Green Warrington	Proposals must engage with people from the 'initial stages of development' - is 'initial stages of development' sufficiently well defined? Could WDG provide requirement for developers to engage with community on wants for new developments? - otherwise not compliant with para 134 of NPPF.	In accordance with paragraph 134 of NPPF, 'all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area'. The Council will ensure developers comply with this requirement as part of wider community pre-application consultation.
Our Green Warrington	More wide ranging set of images needed for current condition - see images in PDF doc - also provide images of good urban design - see PDF doc	Images have been updated to include improved existing condition images, and a new illustration has been added to show the ambition for Warrington.
Our Green Warrington	Point on developments not referencing generic or forgettable developments nearby should be emphasised - provide bad examples here along with examples of good suburban design here	Positive design images are to be included. The document is supported by the 'Building for a Healthy Life' document from Homes England which goes into more detail and is referenced in the Design Guide.
Our Green Warrington	"Homes are contextually responsive but contemporary, giving the site a distinct identity." - too vague, and 'contemporary' creates the impression that new development shouldn't reference traditional architecture	This has been worded so that contextually responsive is first - we view this as encouraging a reflection of the context, but also encouraging innovative and sensitive contemporary design. There is further detail throughout the document, such as the key principle of "Leading with Identity" and the appearance section which applies to all typologies.
Our Green Warrington	Suggest that provision for 'extensive engagement with stakeholders and wider community...' in the Design Guide is	In accordance with paragraph 134 of NPPF, 'all guides and codes should be based on effective community engagement and reflect local

	more prescriptive - so that it is stipulated that collaboration with the local community must take place before any proposals for development are submitted and before a developer is selected by the landowner / land accelerator.	aspirations for the development of their area' . By definition the engagement will happen during the development of the code, rather than before submission. The final part relating to selecting a developer is beyond the Council's remit.
Sport England	Signposted to Sport England's Strategy 'Uniting the Movement' and 'Active Design Guidance'	Reference to both documents added in A.5 / Additional information and resources
United Utilities	Welcome the references to the incorporation of SuDs	Comments duly noted.
United Utilities	References the need to reduce the impact of pylons and overhead lines. We request that this section also references the need to understand the implications of all utility services passing within / near to a development site at the outset of the design process - see doc	This is now covered in section 3.1.3 / Principles / Healthy, happy places
United Utilities	Alongside the need to understand the implications of assets passing through or near to a site, we request that the SPD makes specific reference to understand other constraints.	This is now covered in section 3.1.3 / Principles / Healthy, happy places
United Utilities	Refers to the principles around the climate emergency. We request that it refers to the need to assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design.	Designing for resilience from global warming and flooding is now covered in section 3.1.3 / Principles / Healthy, happy places
United Utilities	Request that this section explicitly states that landscaping proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management.	This point has been added within section 3.1.4 / Integrating SuDs
United Utilities	Under the heading of Integrating SuDs, we welcome the reference to the restoration of existing watercourses. We request that reference is also made to the need to consider the maintenance regimes for watercourses and SuDs in the design of a site.	Reference is made under 3.1.4 / Integrating SuDs to the implementation of Schedule 3 of the Flood and Water Management Act 2010 which will provide national standards on the design, construction, operation and management of SuDs. Reference is also made to maintaining and restoring existing watercourses within this section.
United Utilities	Reference water efficiency within document.	There are references to sustainable water management throughout the document. Section 3.1.4 / Integrating SuDs states that piped water management will be resisted where a SuDs solution is practical.

United Utilities	In accordance with comments on section 03.1.3 request additional reference to the need to fully consider implications of any assets within / near to the site.	This is now covered in section 3.1.3 / Principles / Healthy, happy places
United Utilities	In relation to minor residential and infill development, we request that the SPD references the need for applicants to demonstrate how SuDs can be incorporated on infill sites / minor residential schemes as part of the principle of any planning permission being granted.	This is covered in section 3.1.3 / Site Ambition / Climate resilience. The Council expects SuDs on sites of all scales.
United Utilities	Similarly, in relation to rear garden development, we request that the SPD references the need for applicants to demonstrate how SuDs can be incorporated as part of the principle of any planning permission being granted.	This is covered in section 3.1.3 / Site Ambition / Climate resilience. The Council expects SuDs on sites of all scales.
Warrington Food Network	Recommendation for housing developers to consider using outside open green space for food growing areas; for example allotments, community gardens and orchards.	This is now covered in section 3.1.3 / Principles / Leading with landscape
Cllr Valerie Allen	Would like opportunity to input and engage with Council for drafting of design code elements relating to Culcheth, Glazebury & Croft.	Comments duly noted. The Council will ensure that the Parish Council is engaged in the process of preparing the Borough-wide Design Code.
Lead Local Flood Authority	Developers will be required to undertake their own risk assessments in respect of SuDS / Water features and provide confidence to the LPA that proposals are safe. There are clearly risks associated with water features and their design is the responsibility of the developers	Wording added to p.31 – Designing SuDs.
Lead Local Flood Authority	Ease of maintenance of drainage features should be a primary consideration in selection of drainage systems / SuDS.	Slightly changed introductory wording on SuDs to place the emphasis on considering maintenance from the outset.
Lead Local Flood Authority	Amend wording to "Existing watercourses should be maintained and restored wherever possible to enhance the existing condition of the site. "	Amendment made – point has been removed to align with national legislation for watercourse owners from the EA.
The following additional changes have been made to improve clarity and legibility throughout the document:		
		Changes to the structure of the document have been made to clarify the key design principles at the start of each section.

		The glossary / additional references page has been updated for clarity and to reflect the latest additional guidance
		Additional illustrations have been added to clarify expectations regarding car parking, ensuring we show acceptable and unacceptable arrangements for rear parking and parking courts.
		Additional detail has been provided in respect of the baseline condition of Warrington's different character areas in Section 2.
		Section 03 / Site Strategy has been reviewed and partially reworded to improve legibility.
		Additional images have been included, along with some changes to the images used in the first draft of the Design Guide to further illustrate key principles and best practice.
		An additional 'workplace' indicative scheme has been included along with key considerations to better demonstrate the principles outlined on the pages above.
		Additional text added to 'Principles for homes' in relation to amenity space to recognise the need to protect privacy and consider overlooking.
		The illustrative open space image has been amended to better reflect the Councils adoptable standards.
		Text has been clarified regarding when SuDs can be counted as different types of open space.
		Backland development diagrams within section 05 have been amended for clarification over what is acceptable for access arrangements.
		Illustrative Open Space diagram within section 04 has been amended to reflect adoptable standards, including addition of fences, relocation of community planters and attenuation basin.
		Text regarding overlooking distances within section 05 / Principles for Homes has been clarified to explain when a reduction in front to front distances may be acceptable, and how applicants should justify any reduction through design of buildings / streets.
		Reference to Playlink standards have been removed to avoid conflicts with adoptable standards.

		SuD's wording has been updated to reflect where different types of SuDs are appropriate within different open space typologies.
		Ambition for Warrington diagrams within section 02 have been completed.
		Swales have now been included within the illustration under section 05.3.1 / Major residential.
The following additional changes were made following a second review by the Places Matter independent design review panel:		
		Principles are now highlighted graphically within their relevant sections and compiled as a checklist within the appendices for clarity and ease of reference.
		Section 2.0 has been rewritten. The baseline and aspiration text is now more reflective of the uniqueness of Warrington's Places, and includes more detail of assets, heritage and culture as suggested by the panel.
		Images have been reviewed and updated to show SuDs / drainage where possible.

Appendix 2: Planning Obligations SPD- Main issues and how they have been addressed

Respondent	Comment	Council Response
Barratt & David Wilson Homes (North West)	BDW supports the imposition of planning obligations where they meet this test within the CIL Regulations and welcome the inclusion of paragraph 1.13.	Support noted.
Barratt & David Wilson Homes (North West)	Clarity on status of CIL and relationship with CIL and planning obligations should be reflected within SPD - concern for burden on developers of CIL and planning obligations being sought.	The Council is not proposing to adopt CIL in the immediate future and hence the SPD deals with planning obligations only at this stage. The Council is however committed to reviewing this position, particularly in light of the recently adopted Local Plan, and considers that it is appropriate to reference this in the SPD. The Council will ensure that any planning obligations or CIL charge is fair to developers in accordance with the CIL Regulations.
Barratt & David Wilson Homes (North West)	BDW support the inclusion of paragraph 1.21 which clearly acknowledges that new development should not be expected to independently resolve existing problems within the Borough. This is particularly relevant for major residential development proposals.	Support noted.
Barratt & David Wilson Homes (North West)	Paragraph 1.25 does not set out how thresholds have been evidenced - should be included in table 1. Where thresholds are referenced in Local Plan - refer to specific policies.	Thresholds are explained in each section of the SPD, in terms of their source and the Local Plan. It is intended that the summary table is a quick reference as to the requirements.
Barratt & David Wilson Homes (North West)	Clarify what comprises the 'main development areas' and reference where definitions are outlined.	The Main Development Areas (MDAs) are identified in the Local Plan.
Barratt & David Wilson Homes (North West)	Define 'major development sites of a strategic nature' - not clear whether this applies over a certain number of units or refers only to large strategic allocations.	This will include the MDAs in the Local Plan. There may be other sites of a strategic nature where a new school is required in the future.

Barratt & David Wilson Homes (North West)	BNG - outline where 'exemptions' are specified i.e. within national legislation	Comment noted - Reference added to national legislation.
Barratt & David Wilson Homes (North West)	Paragraph 2.1.1 should refer to the specific NPPF paragraphs which are relevant to affordable housing contributions. We suggest that reference should be added to Paragraphs 61 to 65 of the most recent NPPF (December 2023).	Comment noted – reference added to specific NPPF paragraphs.
Barratt & David Wilson Homes (North West)	As a general point, an overall review of the SPD document should be undertaken to ensure that any references to the NPPF throughout relate to the latest 2023 version	Comment noted - amendment made.
Barratt & David Wilson Homes (North West)	Paragraph 2.1.10 should state that payment of commuted sums “will generally be required” to acknowledge that it is not always possible or appropriate to require payment prior to the first occupation of homes.	No change required as the paragraph allows for payments on a more phased basis where this is appropriate.
Barratt & David Wilson Homes (North West)	The SPD does not refer to where the flat fee of £1,000 for monitoring first homes has been derived from. If possible, this sum should be justified with clear reference to where it is evidenced.	From the Council’s experience of undertaking this monitoring, this is an accurate reflection of the time and input involved.
Barratt & David Wilson Homes (North West)	The reference to NPPF Paragraph 62 is now out of date and should instead refer to Paragraph 70b of the latest version of the NPPF (December 2023)	Comment noted - amendment made.
Barratt & David Wilson Homes (North West)	PO2 - Scope of detail goes beyond requirements of adopted Local Plan and its underpinning evidence and does not reflect the commercial realities of large-scale housing development - it is not clear where requirement for at least one plot is derived from - not referenced in Local Plan	The SPD seeks to expand on provision within the Local Plan and sets a specific requirement as a starting point. PO2 allows for commercial realities to be considered (i.e a fall-back position is set out) and also requirements will be reviewed in the context of the self-build register.
Barratt & David Wilson Homes (North West)	PO2 - Information on Self Build register and level of demand not readily available to allow	Decisions will be made by the Council in the context of the self-build register and current levels of demand. As a starting

	assessment to be accurately made - could also contradict requirement for at least one plot if no demand.	point, it is appropriate that a specific requirement is set out in the SPD. This requirement is in the context of the current level of demand on the self-build register. The register is a live document and the Council will be able to confirm the number of people on the register and any locational preferences at a point in time when a development proposal is coming forward.
Barratt & David Wilson Homes (North West)	PO2 - Clarification needed on Council's expectations for how long marketing period should be. BDW's view that a circa 6-month marketing period would be appropriate	As set out in PO2, the marketing period will vary on a site-by-site basis. The Council considers this should not be overly prescriptive to allow for differing circumstances, both on site and in relation to the housing market at the time of marketing.
Barratt & David Wilson Homes (North West)	PO2 - Approach A - too prescriptive in stating that plots must have minimum services and access and will be marketed to those on the self-build register prior to 50% of all homes being occupied. Additionally, we consider that the trigger points for alternative uses of 2 years from the occupation of 50% of homes not appropriate or justified - should instead specify that prior to commencement, programme and timings shall be agreed on a site-by-site basis instead of setting lengthy and rigid restrictions on alternative uses	Provision in PO2 provides the Council's starting point for the provision of self/custom build homes. There may be cases where a different approach is more appropriate but PO2 sets out the Council's preferred approach. Some minor edits have been made for clarity.
Barratt & David Wilson Homes (North West)	PO2 - Clarity needed on scope and content of evidence required to demonstrate marketing of self-build plots.	Minimum requirements now outlined in this section.
Barratt & David Wilson Homes (North West)	PO3 - Point on how contribution will be calculated does not provide any clarity as to where information regarding educational capacity is available and how applicants / developers can access this - not stated in what capacity costs will be updated annually and how,	This section has been updated to make it clear that data will be taken from the Department for Education 'dashboard', which is broken down by local authority area and updated annually. These changes may result in increased contribution requirements and therefore it is important to stress that they will be subject to not compromising development viability. Information on school capacity can be provided by

	when and where this will be reported - should be publicly available	the Council's education service as part of the pre-application process.
Barratt & David Wilson Homes (North West)	2.3.7 (i) No reference or dates for census data	This section has been updated to make it clear that data will be taken from the Department for Education 'dashboard', which is broken down by local authority area and updated annually.
Barratt & David Wilson Homes (North West)	2.3.7 (ii) Refers to school places "within a reasonable distance" of the development but does not define a numerical threshold for what is considered a reasonable distance.	This is dealt with on a case by case basis depending on location of application site and school and is therefore not fixed.
Barratt & David Wilson Homes (North West)	2.3.9 Costs are high when compared with other Boroughs - do not support unreasonable contributions which may threaten viability	This section has been updated to make it clear that data will be taken from the Department for Education 'score card', which is broken down by local authority area and updated annually. These changes may result in increased contribution requirements and therefore it is important to stress that they will be subject to not compromising development viability.
Barratt & David Wilson Homes (North West)	PO5 - The reference to justifying the standard charge "on average household size and build cost information" alone is too vague and lacks a clear rationale as to how the figure has been calculated.	This information is provided to the Council by the NHS and is used across the country. A broad breakdown of the cost per dwellings is provided at paragraph 2.5.13.
Barratt & David Wilson Homes (North West)	2.5.6 - Vague in terms of detail of how and when the assessment was undertaken. Consultation undertaken to agree the threshold with NHS Partners should be summarised within the paragraph and evidenced where possible.	The threshold is determined in consultation with NHS Partners based on their experience of the scale of development relative to the demand placed on existing services.
Barratt & David Wilson Homes (North West)	2.5.8 - It is not clear where the minimum figure of 7,000 registered patients have been derived from. This should be better evidenced and/or referenced in the paragraph.	The calculation of cost per dwelling is set out and is informed by NHS partners using the latest available data.
Barratt & David Wilson Homes (North West)	2.5.12 - More information needed on how figure has been calculated/justified	The calculation of cost per dwelling is set out and is informed by NHS partners using the latest available data.

Barratt & David Wilson Homes (North West)	2.5.16 - Support the notion that the council will identify specific health projects for which the contribution will be used.	Support noted.
Barratt & David Wilson Homes (North West)	PO7 - Broadly supportive of the Council's general approach to seeking sports contributions and reiterates that the scale and nature of these must be informed by robust evidence and only be sought where existing facilities have insufficient capacity	Support noted.
Barratt & David Wilson Homes (North West)	2.7.9 – The Sport England Playing Pitch Calculator and Sport Facilities Calculate do not cover all these sports listed - request clarity as to how the Council would calculate contributions towards certain sports such as cycling and golf.	The sports listed are those which were assessed as part of the OSSRA. A contribution will only be sought in specific circumstances and confirmed on a case by case basis.
Homes England and Miller Homes	2.3.15 - Strongly support sentence - Where the land provided will accommodate a school which is larger than the demand generated from the development the value of the additional land will be offset against the financial contribution sought.	Support noted.
Homes England and Miller Homes	Consider adding point under healthcare - Where the land provided will accommodate a school which is larger than the demand generated from the development the value of the additional land will be offset against the financial contribution sought.	Comment noted - amendment made.
Homes England and Miller Homes	2.5.19 - Recognise need to comply with CIL regulations, but recommend Council provides evidence now, to expand upon the circumstances around which a contribution may be required - otherwise section should perhaps be removed entirely.	The Council considers it is important to put a marker down within the document for when colleagues in emergency services are in a position to provide an Estates Strategy (or other such document) to support the need for contributions. The text has been amended to further clarify the Council's position.

Homes England and Miller Homes	PO8 - Define 'main development areas'	Main Development Areas are identified in the adopted Local Plan. This is clear in PO8 and has also been identified earlier on in the document in Table 1.
Homes England and Miller Homes	2.7 - This part of the SPD could helpfully recognise that in some situations, where justified, it could be of greater benefit for pitches and other facilities to be provided off-site (as opposed to on-site)	This is recognised in the second paragraph of PO7.
Homes England and Miller Homes	2.9 - It may be beneficial for this section to also recognise that sports and recreation uses could also be legitimate improvement measures to the Green Belt.	Not considered necessary within this document.
Homes England and Miller Homes	2.11 - Suggest WBC consider whether 20% contingency would be consistent with legal tests for contributions - may not be reasonably related in scale and in kind to the proposed development	20% contingency is considered to be appropriate for this specific project on the advice of Natural England.
Peel and Peel NRE Acquisitions No.1	PO3 - SPD does not provide sufficient clarity as to how the size of any land parcel for a new school required (including any allowance for playing fields and nursery provision) as part of new development is to be calculated. Further guidance needed within the draft SPD, for clarity.	The Council does not wish to set out a standard formula in its SPD. The calculation will continue to be informed by guidance from DfE and discussions with colleagues in Education.
Peel and Peel NRE Acquisitions No.1	2.3.15 - Further detail is needed to clarify how the value of additional land offset against financial contribution sought will be determined during the application process.	This will be determined on a case by case basis informed by land values and guidance from DfE and colleagues in Education.
Peel and Peel NRE Acquisitions No.1	2.9 - Provide more detailed advice, including a list of potential GB compensatory improvements against a series of themes and measures. Compensatory improvements should be aligned with the needs of mitigating the specific development (and the impact of removing the land from the Green Belt) and improve the	The Council does not intend to detail site specific compensatory improvements within the SPD. This is not the purpose of the SPD and will be discussed on a site by site basis either through the preparation of a Development Framework, or at planning application stage. The options and appropriate solution will vary and the Council does not wish for this to be overly prescriptive within the SPD.

	environmental quality and accessibility of remaining GB land, as required by the NPPF (paragraph 147).	
Peel and Peel NRE Acquisitions No.1	2.9.11 - Disagrees with the statement that seeks to prevent 'double-counting' of compensatory measures where these relate to improved access. National planning policy and guidance do not seek to make this distinction and neither does the Local Plan Policy GB1 insofar as improved access to the remaining GB is identified as a key compensatory measure. Remove para or amend to specify what 'improved access' relates to.	The Council considers that where requests are made by Transport colleagues as part of the overall accessibility of the site and its ability to meet sustainable transport requirements, these should be considered separately to Green Belt compensatory measures.
Peel and Peel NRE Acquisitions No.1	2.11 - SPD does not provide sufficient clarity as to how the final costs of the mitigation scheme for Holcroft Moss will be quantified or calculated pursuant to a specific development. Agreed mitigation scheme between WBC, GMCA and NE should be made available within SPD	The Council considers sufficient clarity has been provided in the SPD and within the supplementary note on Baseline Costs which was published along with the Draft SPD. The costs and methodology have been agreed with Natural England.
Peel and Peel NRE Acquisitions No.1	2.11 - No mention of how contributions will be repaid should the total amount of developer contributions collected exceed the costs required to implement the Habitat Management Plan	The Council considers sufficient clarity has been provided in the SPD and within the supplementary note on Baseline Costs which was published along with the Draft SPD.
Peel and Peel NRE Acquisitions No.1	2.11 - Requests confirmation that the Council will publish monitoring information on the monetary contributions received from developers for the provision of the Habitat Management Plan (alongside other infrastructure funding) and the subsequent allocation/use of these monies on an annual basis.	The Council will provide this information in its Infrastructure Funding Statement which is published annually.
Cllr Dr David Ellis	2.8 - 10% target for renewables is too low given town's net zero targets - perhaps change wording	This is in accordance with the provisions of the adopted Local Plan (Policy ENV7).
Cllr Judith Wheeler	Stockton Heath will be adversely affected by development in SE Warrington. Stockton Heath	Comments noted. The Council, together with landowners of the SEWUE, is committed to working with local communities

	Parish Council wants to ensure it is part of any discussions for monitoring and mitigation measures.	including parish councils through the production of the Development Framework for the site.
Croft Parish Council	The document is very generic and mainly repeats information within the adopted Local Plan, national and other guidance.	The SPD seeks to expand on provision within the Local Plan by providing guidance as to how development must mitigate its impact on various services/infrastructure and the environment. However, it cannot introduce new policy requirements.
Croft Parish Council	2.8 - Climate change section is unambitious.	The SPD must reflect the provisions of the adopted Local Plan and cannot seek to introduce new policy requirements.
Croft Parish Council	2.9 - Deals with Compensatory Green Belt Improvements, but in a relatively low-key and permissive way.	The SPD must reflect the provisions of the adopted Local Plan and cannot seek to introduce new policy requirements.
Grappenhall and Thelwall Parish Council	The document is not sufficiently definitive and is weakened by the use of the expression 'seek to' several times in describing the benefit that will be sought.	The phrase 'seek to' reflects the intentions of the Council to action something at a future point in time, having regard for variables and current unknowns. The Council considers this is the correct terminology for the SPD and does not water down the policy requirements.
Grappenhall and Thelwall Parish Council	Reference at paragraph 1.19 that 'development sites should not be subdivided or developed in phases to create separate development schemes which fall below site size thresholds'. However, it is not clear how this will be done or how the Council will avoid such obligation evasion. Further detail on this would be useful.	The Council will generally be aware of situations where a developer/or other developer owns a larger area of land and is attempting to bring this forward as phase 1 of a potentially larger site (this may be through call for sites or other evidence which has informed the Local Plan). Also, most larger development sites in the Borough have been allocated through the Local Plan and the Council therefore has a good handle on landownership of those sites and has already made provision for necessary infrastructure through site specific allocation policies.
Grappenhall and Thelwall Parish Council	Final section on 'enforcement' is short and would benefit from perhaps an organogram and process flowchart like earlier in the document.	The section on enforcement is intended to be for information only and to demonstrate that there is recourse on agreed provision - actual enforcement will be dealt with through the legal process with regard to S106 agreements.

Grappenhall and Thelwall Parish Council	SPD will only have value if used on a daily basis - monitoring team should have some autonomy and have links to Warrington Borough Council's (WBC's) Senior Management Team independent of the Planning Department/Director of Growth	The Council has governance arrangements in place for the monitoring of S106 Agreements.
Appleton Parish Council	2.12 - Emphasise to developers that the 10% Biodiversity Net Gain expected of new development is ADDITIONAL to the provision of Compensatory Green Belt Improvements for land removed from the Green Belt.	It is considered that the relationship between Biodiversity Net Gain and compensatory Green Belt improvements is clear within the document.
Appleton Parish Council	SEWUE - Given that proposed housing development is likely to take place in stages over a considerable period of time, the Council needs to set out clear plans at the outset of infrastructure development, particularly roads and highways. - this principle should also apply to schools, health services, retail and community facilities	Key infrastructure requirements have been set out in Policy MD2 of the Local Plan. In addition, the next step is for the landowners to prepare a Development Framework, working closely with the Council and local residents/key community groups / parish councils - this document will set out a clear list of infrastructure requirements and how these will be delivered - prior to planning applications being received. This will ensure a site wide approach is taken and the full needs of the development are taken account of.
Appleton Parish Council	2.8 - The Council should provide more detail and (examples) of optional measures to meet the requirements for 10% energy need from renewable/low carbon energy sources.	Not the purpose of the document - developers are to demonstrate how this target will be met.
Cheshire Wildlife Trust	2.6 - Would like more specific requirements for open space in developments to be nature and biodiversity focused - more natural elements. Council could advocate for the use of Building with Nature Framework and more closely link green space requirements to BNG.	National Biodiversity Net Gain requirements are now in place addressing this concern. It is likely that areas of open space and BNG will align where this is feasible.
Cheshire Wildlife Trust	2.8 - Would like to see more assertive language advocating for nature-based solutions as a priority for climate change and energy related issues.	Specific measures for addressing climate change and energy will be considered on a site by site basis. Nature based solutions will be encouraged wherever this is practical.

Cheshire Wildlife Trust	2.12.2 - We would like to see a more explicit reminder of the original mitigation hierarchy whereby developers should seek to avoid, reduce, mitigate, and compensate before BNG is applied.	BNG requirements are set nationally having regard for the mitigation hierarchy. This is re-enforced in Local Plan Policy and the SPD. The wording of the SPD has been updated to ensure consistency with the national and Local Plan policy.
Cheshire Wildlife Trust	2.12.8 - Raise the minimum BNG gains from 10% to 20%	BNG requirements are set nationally through the provisions of the Environment Act 2021. 10% is a minimum requirement and any increase above this would need to be justified through a review of the Local Plan.
Cheshire Wildlife Trust	2.12.8 - Recommend that BNG be protected in perpetuity on council-owned land and to go beyond the minimum requirement of 30 years	This is over and above national requirements and the Council has no ability to enforce this.
Cheshire Wildlife Trust	2.12.9 - In addition to the priority of on-site gains, off-site gains must be as close to the development area as possible so as to not remove nature from that community or local area.	BNG requirements are set nationally through the provisions of the Environment Act 2021. Local Plan policy re-enforces the hierarchy set at the national level. The SPD does seek to prioritise off-site provision on registered sites within the borough in the first instance.
Cheshire Wildlife Trust	2.12.10 - Additional gains should be aligned with the proposed development instead of being sold as excess for another development to ensure maximum gains and increase nature recovery in the same area as the development and within the borough.	BNG requirements are set nationally through the provisions of the Environment Act 2021. Local Plan policy re-enforces the hierarchy set at the national level.
Cheshire Wildlife Trust	2.12.11 - In addition to a s106 agreement, the option for a conservation covenant with a responsible body should be provided.	Comment noted - amendment made.
Cheshire Wildlife Trust	2.12 - Strongly urge the council to include a complete exclusion of irreplaceable habitats from being developed on.	This issue is dealt with under Policy DC4 of the adopted Local Plan.
Cheshire Wildlife Trust	Include a section in PO12 explicitly rejecting proposed developments which will have unacceptable impacts (disturbance, disruption,	This issue is dealt with under Policy DC4 of the adopted Local Plan.

	destruction, threat, displacement) on protected sites, priority habitats etc.	
Cheshire Wildlife Trust	Section 3 - Would like to see a more detailed description of the anticipated monitoring process that the council will undertake.	This level of detail is considered appropriate to monitoring relevant to the Planning Obligations SPD. More detailed monitoring is carried out in relation to the Local Plan indicators and presented in the Annual Monitoring Report and Infrastructure Funding Statement.
Department for Education	2.3.15 - Unclear whether the Council is relying on historic DfE cost multipliers to estimate costs per place, or the local authority school places scorecards, which are now recommended. SPD is underestimating the costs of school provision. Further to this, paragraphs 33 and 34 of DfE's guidance recommends that costs are uplifted to take account of the latest policy requirements for sustainable construction, which are not reflected in the scorecard's historic data on the capital costs of school development.	The Council has updated the SPD to reflect the scorecards and dashboard information advised by the DfE. The Council is not proposing a further uplift over and above the published information as we are not able to evidence any additional uplift and any further increase could raise viability issues. Once a contribution has been agreed in a Section 106 Agreement, this will be subject to BCIS indexation.
Department for Education	2.3 - Higher costs for new schools should be recognised.	The Council has updated the SPD to reflect the scorecards and dashboard information advised by the DfE. These changes may result in increased contribution requirements and therefore it is important to stress that they will be subject to not compromising development viability.
Department for Education	2.3 - The pupil yield factors set out in paragraph 2.3.7 do not match those for Warrington in DfE's pupil yield dashboard, ³ but they are broadly similar. The SPD would be strengthened by referring to the DfE guidance, Estimating Pupil Yield from Housing Development.	The Council has updated the SPD to reflect the scorecards and dashboard information advised by the DfE. These changes may result in increased contribution requirements and therefore it is important to stress that they will be subject to not compromising development viability.
Department for Education	2.3 - The department does not support the SPD's intention to combine developer contributions for early years, post-16 and SEND places with the	The Council has updated the SPD to reflect the scorecards and dashboard information advised by the DfE. The SPD now asks for early years, post-16 and SEND contributions where required. These changes may result in increased

	contributions for school places, without any consequential uplift in the pupil yield factors.	contribution requirements and therefore it is important to stress that they will be subject to not compromising development viability.
Department for Education	2.3 - It would also be helpful if the document recognised the higher costs associated with providing places in special schools and alternative provision, where the cost is typically, at least, four times greater than for a mainstream school place. The DfE's recently revised Developer Contributions Guidance document provides useful guidance on this subject.	The Council has updated the SPD to reflect the scorecards and dashboard information advised by the DfE. These changes may result in increased contribution requirements and therefore it is important to stress that they will be subject to not compromising development viability.
GMCA	Supports the inclusion of mechanism to secure appropriate mitigation for Holcroft Moss SAC.	Support noted.
National Highways	Amend 'Highways England to 'National Highways'	Comment noted - amendment made.
Natural England	Support the recognition of contributions to management and restoration at Manchester Mosses Special Area of Conservation (SAC), specifically at Holcroft Moss.	Support noted.
NHS Property Services	Table in section 2.5 - Note that the new build costs for the contribution per dwelling are based on total extension and refurbishment works and should therefore be referred to as the total cost of required primary floorspace in table.	Comment noted - amendment made.
NHS Property Services	Delete paragraph 2.5.12. Minor changes for clarity.	Comment noted - amendment made.
NHS Property Services	Insert new para - Development proposals for specialist and older persons housing can comprise a range of types, including sheltered accommodation, residential care homes, extra care and adaptable homes. These developments could have significant impacts on the demand for healthcare infrastructure. Such schemes will be dealt with on a case-by-case basis, taking into	Comment noted - amendment made.

	account the unique characteristics of the scheme. The Council will work closely with NHS partners to identify appropriate mitigation measures and developer contributions	
Sport England	Amend to "Sport England's "Playing Pitch Strategy Guidance 2018" as updated in December 2021"	Comment noted - amendment made.
Sport England	Amend - "Playing Pitch Provision - Additional new pitch provision will not necessarily be required to be provided on-site as it may be that it could be provided in existing open space that is under-utilised or where improvements to existing provision would best serve the demand. Where this is the case a financial contribution will be sought and secured through S106 Agreement. The contribution will be defined based on the scale of increased use likely to arise from the development proposal and taking into account the specific improvement the Council is seeking to implement. Where sports pitch provision is to be located on site, the Council's preference is for the developer to take on the responsibility for the management and maintenance. In exceptional circumstances where the Council agree to take over the responsibility for the management and maintenance of the provision a financial contribution will be required towards future maintenance costs. Where a developer is proposing to manage/maintain sports pitches, this will be secured through appropriate conditions and/or S106 Agreement. Any new area of playing field should meet the requirements set	Comment noted - amendment made.

	out in Sport England’s “Playing Pitch Strategy Guidance 2018.”.	
Police and Crime Commissioner for Cheshire (PCC), Cheshire Constabulary (CC) and Cheshire Fire & Rescue Service (CFRS)	The entire section on emergency services does not go far enough in requiring developers to assess the needs of development proposals in terms of emergency services demand. This section should be amended to clearly state that Warrington Borough Council will require residential development and non-residential development (e.g. night-time economy) to contribute, where required, towards the delivery of infrastructure to serve new developments and mitigate against their impacts upon existing emergency services resources.	The Planning Obligations SPD recognises that contributions may be appropriate towards emergency services. The Council clearly has to ensure that any contributions comply with the CIL regulations; that they are properly evidenced; and that these are taken towards capital costs only. The Council has however updated the wording to provide greater clarity. The Council is happy to keep this position under review.
Police and Crime Commissioner for Cheshire (PCC), Cheshire Constabulary (CC) and Cheshire Fire & Rescue Service (CFRS)	Table 1 - Update requirements to apply to 'all development types' and the threshold to read 'Where the demand or impact cannot be met by existing emergency services infrastructure'.	The Council considers it is appropriate to set a threshold for such requirements having regard for the thresholds set for other infrastructure items. It is considered that a threshold of 50 units is appropriate for the provision of additional emergency services infrastructure in this context.

Additional consultation responses on updated education requirements

Respondent	Comment	Council Response
Barratt and David Wilson Homes (North West)	Welcome clarity as to how calculations for contributions will be made using Department for Education data.	Comments relating to the use of DfE data and requirements noted.
Barratt and David Wilson Homes (North West)	Request confirmation that costs will be updated annually and that the Council is clear as to levels of capacity at existing schools.	DfE will update costs for school places annually. The Council will refer to latest school capacity and forecasting data that it has available at the time that a development proposal/planning application is being considered – this point has been clarified in the updated SPD.
Barratt and David Wilson Homes (North West)	Whilst the provision of appropriate infrastructure is supported, unreasonable requests which are a risk to viability and deliverability will not be supported.	Comments regarding viability noted and this will be considered on a case-by-case basis.
Homes England and Miller Homes	The Council is now relying upon DfE yields rather than its own local evidence which is a choice and not a requirement.	Comments noted. The Council is mindful that DfE data is the most up to date information available and this should be utilised as a starting point going forward.
Homes England and Miller Homes	The requirement to provide additional developer contributions towards new education places at the Early Years, Post-16 and SEND levels was not expressly identified or considered during preparation of the newly adopted Warrington Local Plan (December 2023). Consequently, the Council has not yet identified the potential additional land use implications on allocated sites	The Council must meet the requirements of the DfE and consider the need for statutory provision of early years, post-16 and SEND. It is accepted that the Local Plan Viability Assessment did not give specific consideration to contributions towards early years, post-16 and SEND. The Viability Assessment did however include a level of contingency to cover unanticipated additional costs. Local Plan Policy INF5 and the Planning Obligations SPD confirm

	(such as the SEWUE). In addition, the viability implications were not assessed as part of the Local Plan process and are therefore unknown at this time.	that if there are site specific viability issues then this can be assessed at the planning application stage. The Council has further clarified this point in the introductory section to the SPD.
Homes England and Miller Homes	Any changes to the Draft SPD need to reflect the guidance contained within the Planning Practice Guidance (PPG) regarding Planning Obligations (Para 004) and the limitations around their specificity.	Comments noted. The Council considers that the SPD is in accordance with the PPG.
Homes England and Miller Homes	Specific concern regarding early years provision and the need for recognition that this will not all be delivered by the public sector – market providers will deliver some of the requirements.	Comments noted – an amendment has been made to the SPD to acknowledge this point.
Natural England	No further comments.	
Health & Safety Executive	No further comments.	
National Highways	No further comments.	
Canal and Rivers Trust	No further comments.	
Historic England	No further comments.	

In addition to the above, a number of minor wording and editing changes have been made to improve clarity throughout the document:

		In consultation with the lead advisor of Natural England, a number of refinements have been made to the Biodiversity section of the SPD to clarify procedures and requirements and to ensure consistency with statutory BNG requirements.
		In considering the implementation of the self-build requirement in recent planning applications, minor amendments have been made to improve clarity.
		Additional wording has been provided to clarify how the Council will monitor planning obligations and, in particular, how indexation will be applied over time to ensure the impacts of a development can be appropriately mitigated when it is being built out over a number of years / in phases.
		Text in Figure 2 has been amended to ensure consistency in the approach to considering adjacent areas when determining open space requirements.
		A minor amendment to the education section has been made to clarify the threshold for securing contributions and the size of dwellings that are included in the contribution calculation.
		Text has been added to the Flood Protection and Water Management section to clarify the approach to including SuDS within areas of open space.
		Appendix 1 has been updated to clarify the Council's latest requirements for equipped play provision.

		The worked example of the monitoring fee in Appendix 2 of the SPD has been updated to reflect all relevant contributions.
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Appendix 3: Environmental Protection SPD- Main issues and how they have been addressed

Respondent	Comment	Council Response
United Utilities	Section 1.4 – We request that this section refers to the 'Agent of Change' Principle at Paragraph 193 of the National Planning Policy Framework and as outlined in the National Planning Practice Guidance.	Section 1.4 refers to the National Planning Policy Framework (NPPF). The 'agent of change' principle would be taken into account in any planning decisions as part of this as would any other requirements under the NPPF. It is not the intention of this SPD to set detailed requirements already contained within other policy documents.
United Utilities	4th Paragraph of Section 2.3.2 - The way that this paragraph is written implies that uses such as industrial / logistics would not be odour sensitive. We would recommend it is rephrased rather than seeking to define odour sensitive developments. In our experience of considering development proposals near to our wastewater treatment works, it is overly simplistic to conclude that uses such as industrial / logistics will not also be sensitive to odour emissions in some circumstances. We believe a more appropriate way forward is to acknowledge that any development would need to be considered on its own merits in accordance with the IAQM 'Guidance on the Assessment of Odour for Planning' when it is introduced in proximity to an existing source of odour.	The sensitive receptors listed are given as an example but are not an exhaustive list. The text though has now been amended to include 'employment areas'. The IAQM guidance is referred to in paragraph 5 for how assessments must be carried out.
United Utilities	Final paragraph of Section 2.4.6 - We request that this section references the need to consult with the wastewater company when an odour impact assessment is being undertaken in respect of development in proximity to a wastewater treatment works / pumping station / storage facility. We request that the scope of any OIA	Agreed. The following wording has been added: 'We would recommend that a developer consults with any operators of existing odour sources, for example waste water treatment works or industrial sources, when an OIA is being carried out.'

	should be prepared in liaison with the operator of the existing facility that is a source of odour emissions.	
United Utilities	Final paragraph of Section 2.5 relating to Odour Control Mitigation – We request that this paragraph is expanded to reflect the fact that any mitigation identified as part of an odour impact assessment (OIA) would need to be implemented to protect the introduction of new uses in proximity to an existing use, which is a source of odour in accordance with the agent of change principle.	The agent of change principle is included within the NPPF and will be considered within the planning consultation process. No changes to the SPD are proposed.
Peel NRE	Peel recognises the importance of the role new development has in protecting the environmental and improving peoples' health, wellbeing and amenity. We support the ambitions, objectives and principles of the draft SPD.	Comments duly noted.
Stockton Heath PC	Stockton Heath will be adversely affected by the proposed developments in South East Warrington - additional traffic and de facto, poorer air quality. Stockton Heath Parish Council wants to ensure it is part of any discussions for monitoring and mitigation measures.	Comments duly noted. There will be an opportunity to discuss these issues through the progression of the South East Warrington Urban Extension Development Framework to guide development of the site and also through the planning application process at the appropriate time.
Croft PC	The Council should anticipate the imminent implementation of Environmental Outcome Reports (which will replace Environmental Statements) to avoid the new SPD from becoming quickly out of date. It would have been useful for the draft SPD to have considered this.	The Environmental Outcomes Reports are under consultation. If they are implemented and replace Environmental Statements then the SPD can have a future minor amendment depending upon if there would be any significant policy change implications.
Croft PC	Air quality – the thresholds for air quality assessments are well-established and the draft SPD does not impose any additional local requirements.	It is not the role of an SPD to introduce new planning policy, the role of an SPD is to supplement policies of the adopted Local Plan, in this instance, but not exclusively Policy ENV8

		Environmental & Amenity Protection which specifically covers air quality.
Croft PC	Note that while the document mainly repeats information contained within national planning guidance and various other national standards, often regulated by bodies outside the local planning authority, that nevertheless it is a helpful tool for potential developers.	Comments duly noted.
Croft PC	The Parish Council is pleased to note that the Borough offers developers a Contaminated Land Pre-application Advice Service.	Comments duly noted.
Grappenhall & Thelwall PC	The Council supports the intention of the SPD to set out requirements for reducing air pollution emissions, including odour, from any new development as well as protecting 'new receptors' from an existing air quality problem or issue. It is also supportive of national policy as set out in the National Planning Policy Framework and detailed at paragraph 2.2.1 of the SPD.	Comments duly noted.
Grappenhall & Thelwall PC	Para 2.3 of the SPD includes a set of indicative criteria and provides specific guidance for when an air quality assessment is likely to be required, in line with the EPUK guidance document. However, this does not explicitly include children. Evidence shows that children are more vulnerable to poor air quality than adults so the Council would contend that the impact on children should be included as a specific criteria. See https://www.bbc.co.uk/news/uk-scotland-67934837 and https://aaqr.org/articles/aaqr-23-03-0a-0062 .	The criteria is based on an average adult and there are no health based criteria set out for children or other vulnerable groups that can be applied.

Grappenhall & Thelwall PC	Section 2.5 of the SPD indicates that mitigation will be required from any developments that are detrimental to air quality. However, indoor air quality is not assessed as part of the Warrington Borough Council's air quality management duties. Whilst the Council acknowledges that this SPD is not specifically designed to address indoor air quality it would suggest that the design of buildings should incorporate best practice measure to reduce exposure from poor indoor air quality.	It is not the role of an SPD to introduce new planning policy, the role of an SPD is to supplement policies of the adopted Local Plan.
Grappenhall & Thelwall PC	The Council would support the measures listed which include adequate ventilation, choice of building materials to reduce VOC levels, insulation, and appropriate heating and cooking facilities.	Comments duly noted.
Grappenhall & Thelwall PC	The Council notes that further information is available in the Draft Design Guide SPD that is currently out for consultation. However, this is very brief and does not assess any new measures. At page 52 of the Design Guide SPD it states 'Designs must consider indoor air quality, and the mitigation of off-gassing and volatile organic compounds (VOCs) after construction work. Both material choice and the provision of adequate ventilation is essential to addressing indoor air quality'.	This has been dealt with under the Design Guide SPD responses above.
Grappenhall & Thelwall PC	The Council supports the proposal that reference should also be made to the EPUK IAQM Indoor Air Quality Guidance: Assessment, Monitoring, Modelling and Mitigation. However air filtration or air cleaning is not specified. The Council would suggest that the detailed mitigation measure	This SPD is not to designed to address indoor air quality but has included it to encourage best practice. Some mitigation measures are set out but it is accepted that these are not an exhaustive list and mitigation will be considered within any assessment.

	<p>should also include adequate filtration of indoor air to mitigate the impact of polluted/contaminated air, again particularly for children. Relatively cheap and very effective air cleaners are now available and should be incorporated into all new buildings in accordance with EPUK IAQM Indoor Air Quality Guidance: Assessment, Monitoring, Modelling and Mitigation chapter 7 – mitigations and improvement opportunities (and as referenced in section 2.5).</p>	
Natural England	<p>The majority of the environmental impacts covered in the Draft Environmental Protection SPD are applicable to ecological receptors as well as human health, although we note that the SPD considers human health aspects only. We suggest that the SPD be clear on this issue and that ecological receptors are either included in detail or by a signpost to the relevant document.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	<p>Comments duly noted. The SPD covers impacts on human health only. This has been made clearer in the introduction section. The Local Plan contains detailed policies in respect of the borough's ecological assets, with additional detail provided in the Planning Obligations SPD and Design Guide SPD.</p>
Canal & River Trust	<p>The Trust have limited land interests within the authority area. There are however long terms aspirations to restore the former canal, this is not owned by the Trust. Some limited parts are in water and form important habitat. In this regard we welcome the policies seeking to protect watercourses and section 3.5.3 in relation to JKW and invasive species.</p>	<p>Comments duly noted.</p>

Appleton PC	<p>As the body responsible for infrastructure planning, Warrington Borough Council should establish additional air quality monitoring sites in Appleton to measure the baseline and trends from i); increased vehicle traffic on the routes taken by residents and associated commercial vehicles and ii) use of wood burning stoves from the new housing developments and additional planned for the South of Warrington. Monitoring devices should include devices to measure PM 2.5 and PM10 particulates.</p> <p>This should include street level monitoring particularly on the junctions to the A49 (London Road), notably at Stretton and Lyons Lane junctions. Similar monitoring would also be justified on the A49 in Stockton Heath. The increasing traffic along the A49 may not at present be as intense as some parts of Warrington centre but the proximity to residential areas, a major shopping street in Stockton Heath and above all a large secondary school of which the majority of pupils walk along this road to and from school.</p>	<p>The designation of additional air quality monitoring sites is not a function of a Supplementary Planning Document. The majority of Warrington has good air quality and we continue to review pollution levels and to designate Air Quality Management Areas where necessary. Therefore, it is not considered necessary to establish additional monitoring sites as suggested at this point in time.</p>
National Highways	<p>Although much of the Draft Environmental Protection SPD falls outside the remit of National Highways, we are supportive of the proposal with section 2.5 Mitigation to encourage a modal shift from motorised transport to active travel, especially for short journeys. Not only does this seek to improve air quality but would also lead to a reduction in the amount of traffic on the roads.</p>	<p>Comments duly noted.</p>
National Highways	<p>We are also supportive in particular of paragraph 4.5.2 in the section on Lighting, recommending</p>	<p>Comments duly noted.</p>

	<p>that lighting be directed downwards wherever possible. National Highways would likely seek conditions on planning permissions to ensure that light from neighbouring developments was not aimed towards the road or drivers.</p>	
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