

From: [REDACTED]
Sent: 15 April 2025 15:18
To: Strategic Planning
Subject: RE: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

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OFFICIAL

Good Afternoon,

Thank you for your email. ATE is not a statutory consultee for Neighbourhood Plans. There is guidance available for neighbourhood groups that are developing a Neighbourhood Plan. This explains which transport matters a Neighbourhood Plan can address, including planning for active travel (walking, cycling and wheeling). You can access this on [Locality's Neighbourhood Planning website](#).

Thank you,



Active Travel
England

Development Management Team, Active Travel England,
[REDACTED]

Follow us on X [@activetraveleng](#), Instagram [@activetravelengland](#) and on [LinkedIn](#)

OFFICIAL

From: [REDACTED] **On Behalf Of** Strategic Planning
Sent: 15 April 2025 11:37
To: Strategic Planning
Subject: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

Dear Sir/ Madam,

RE: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

Warburton Parish Council submitted their draft Neighbourhood Development Plan on 28th February 2025. Trafford Council is now administrating the (Regulation 16) Consultation on the draft Warburton Neighbourhood Development Plan, which will run from 15 April 2025 until 3 June 2025, 23:59.

Where to view the consultation documents

The draft Warburton Neighbourhood Development Plan and associated documents are available to view on the Strategic Planning web pages at: [Warburton Neighbourhood Plan](#)

The documents are also available to view on screens in all Trafford libraries during normal opening hours and a hard copy is available at Partington Library or on request (please contact Strategic Planning). For more information about locations and opening hours go to: <http://www.trafford.gov.uk/libraries>.

How to comment

Comments are invited on the draft Warburton Neighbourhood Development Plan until 3 June 2025, 23:59.

Comments on the plan should be made using the comment form (editable PDF) available on Trafford Council's website (above) and emailed to strategic.planning@trafford.gov.uk. Alternatively, comments can be posted to: Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford. M32 0TH.

Please consider and refer to the [Basic Conditions](#), as appropriate, in your representation.

Please be aware that all representations made through the Regulation 16 Consultation will be publicly available (including the Council's website) and may also appear on the Warburton Parish Council websites.

Should you require further information, then please contact the Strategic Planning team on the contact details above.

Next steps

Following the conclusion of the consultation, the responses received will be collated and sent to the independent examiner who will consider the comments in preparing an examiner's report.

Upon publication of the examiner's report Trafford Council are then required to make a decision on the plan proposal and issue a decision statement. The Warburton Neighbourhood Development Plan, if 'made', will form part of the Development Plan for Trafford Council and thus would be used by the Council to help it decide planning applications within the neighbourhood area.

If you no longer wish to be contacted about Trafford's planning policy documents – including the Local Plan, please email strategic.planning@trafford.gov.uk or contact us by telephone on 0161 912 3149.

Yours sincerely

The Strategic Planning and Growth Team

Strategic Growth Services

Growth, Communities & Housing Service

Trafford Council | Trafford Town Hall, Talbot Road, Manchester M32 0TH

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Strategic Planning & Growth Team
Trafford Council

[REDACTED]
Our ref: PL00796310

22 May 2025

Dear Strategic Planning & Growth Team

**Warburton Neighbourhood Development Plan
Regulation 16 Consultation, April-June 2025**

Thank you for consulting Historic England in relation to the above consultation. We are the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the DCMS. We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure that our historic environment is properly understood, enjoyed and cared for.

We do not wish to make comments in relation to this version of Warburton Neighbourhood Plan, and consider that the planning and heritage/ design staff at Trafford Council are best placed to assist in relation to the historic environment.

To avoid any doubt, this does not reflect our obligation to provide further advice or potentially object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

Thank you once again for providing Historic England with the opportunity to comment. Please do keep us informed of any future progress on this plan.

Yours sincerely,

Pippa Brown
Historic Places Adviser

[REDACTED]

cc:



[REDACTED]

[REDACTED]
HistoricEngland.org.uk



Our Ref: MV/ 15B901605

avisonyoung.co.uk

02 June 2025



Trafford Council
strategic.planning@trafford.gov.uk
via email only

Dear Sir / Madam

**Warburton Neighbourhood Plan - Regulation 16 Consultation
April – June 2025
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:



Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Kam Liddar, Asset Protection Lead

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[REDACTED]

**Matt Verlander MRTPI
Director**

[REDACTED]

For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

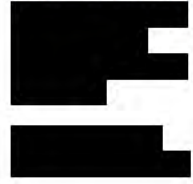
National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [REDACTED]



Our Ref: 105181-024

03 June 2025

Trafford Council
strategic.planning@trafford.gov.uk

via email only

Dear Sir /Madam,

Warburton Neighbourhood Plan Consultation 15th April to 3rd June 2025 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.

NGET assets within the Plan area

Following a review of the above Neighbourhood Plan, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

Asset Description

ZO ROUTE TWR (011R - 197): 400Kv Overhead Transmission Line route: DAINES - DEESIDE 1 & DAINES - DEESIDE 2

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.



<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner

[Redacted]

Fisher German LLP

[Redacted]

Tiffany Bates, Development Liaison Officer

[Redacted]

National Grid Electricity Transmission

[Redacted]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Angela Brooks MRTPI
Partner

For and on behalf of Fisher German LLP



Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

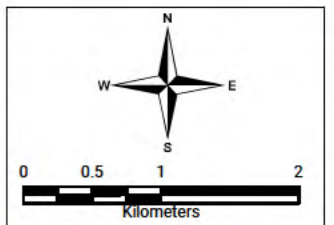
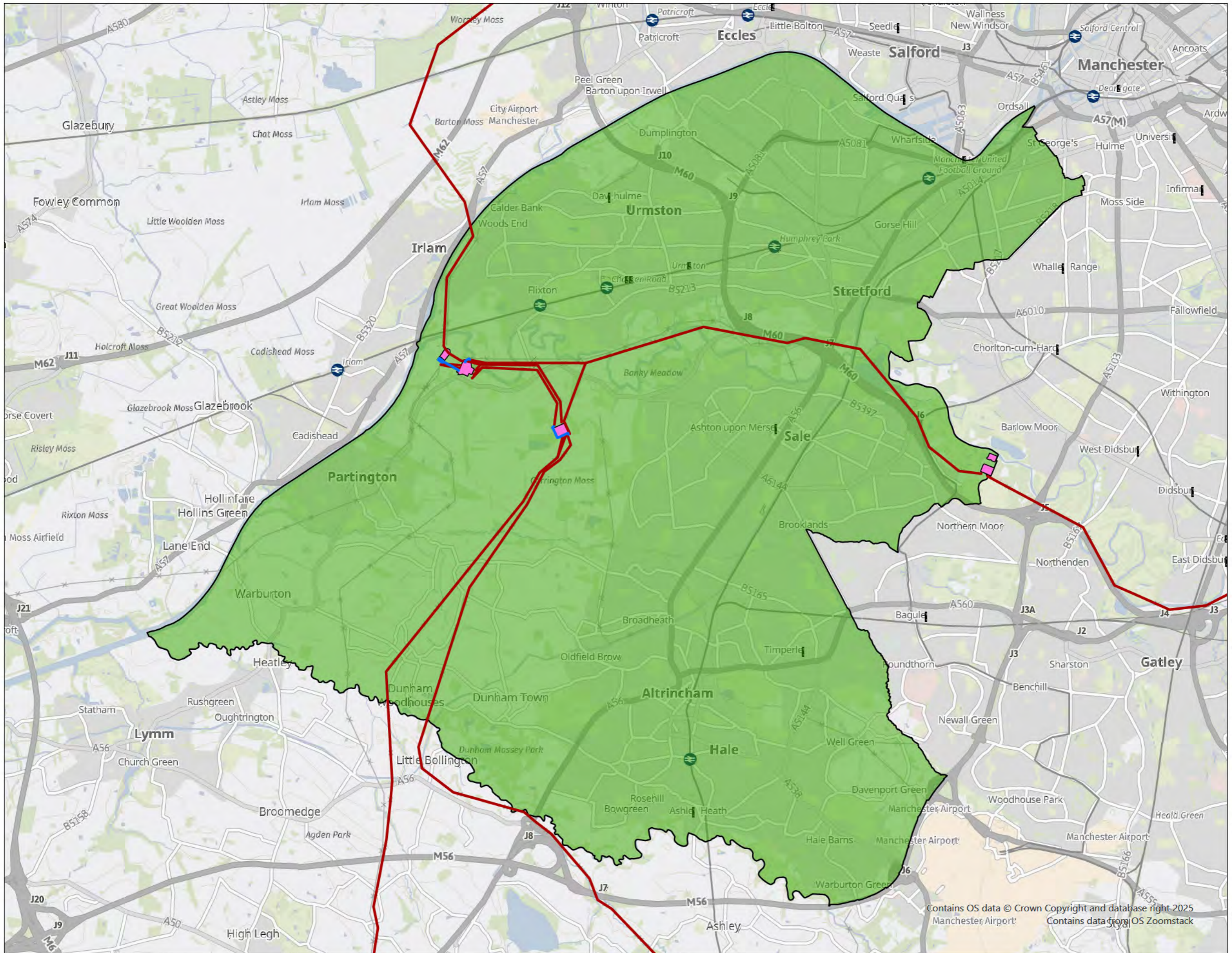
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [REDACTED]



- LEGEND:**
- Cable
 - OHL
 - Substation
 - LPA Area

REVISION: A
 CLIENT: nationalgrid
 SCHEME: PLANNING INTERACTION
 TITLE: LPA ASSET INTERACTION
 FP: 105181-024
 SCALE: 1:55,000 @ A3
 DATE: 20/05/2025



DRAWING REF: NG-2025-03-OT-OP-LPA- Trafford

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From: Adam Johnson [REDACTED]
Sent: 01 May 2025 13:31
To: Strategic Planning
Subject: National Highways Response: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

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Good afternoon

Thank you for consulting National Highways regarding the draft Warburton Neighbourhood Plan.

Given the scope of the draft policies, National Highways will not look to comment at this time. It should be noted, however, that we are engaged with Trafford Council on the New Carrington Places for Everyone allocation. We will therefore look to consider the wider implications of that site separate to matters within this Neighbourhood Plan, including the provision of public transport as part of the vision for the development.

Kind regards

Adam

Adam Johnson | Spatial Planner
Cheshire | Merseyside | Greater Manchester
Spatial Planning Team, North West Operations

Web: <http://www.nationalhighways.co.uk/>

For information and guidance on planning and the Strategic Road Network in England, please visit:
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

From: [REDACTED]
Sent: 15 April 2025 11:28
To: Strategic Planning
Subject: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

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RE: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

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Should you require further information, then please contact the Strategic Planning team on the contact details above.

Next steps

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Upon publication of the examiner's report Trafford Council are then required to make a decision on the plan proposal and issue a decision statement. The Warburton Neighbourhood Development Plan, if 'made', will form part of the Development Plan for Trafford Council and thus would be used by the Council to help it decide planning applications within the neighbourhood area.

If you no longer wish to be contacted about Trafford's planning policy documents – including the Local Plan, please email strategic.planning@trafford.gov.uk or contact us by telephone on 0161 912 3149.

Yours sincerely

The Strategic Planning and Growth Team

Strategic Growth Services

Growth, Communities & Housing Service

Trafford Council | Trafford Town Hall, Talbot Road, Manchester M32 0TH

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National Highways Limited | [REDACTED]

<https://nationalhighways.co.uk> | [REDACTED]

Registered in England and Wales no 9346363 | Registered Office: [REDACTED]
[REDACTED]

Consider the environment. Please don't print this e-mail unless you really need to.

Date: 30 May 2025
Our ref: 509973
Your ref: Warburton Neighbourhood Plan



The Strategic Planning & Growth Team
Trafford Council

BY EMAIL ONLY

strategic.planning@trafford.gov.uk

Dear Sir/Madam

Warburton Neighbourhood Plan 2025-2039 - Regulation 16 Consultation

Thank you for your consultation on the above dated 15 April 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [REDACTED]

Yours faithfully
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Trafford MBC

FAO: Strategic Planning

By email only

30th May 2025

Warburton Neighbourhood Plan - Consultation
Sport England Reference: SP/25/00006561

Thank you for consulting Sport England in respect of the draft Warburton Neighbourhood Plan.

OVERVIEW:

Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

PLAYING FIELD PROTECTION:

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 103 and 104. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

NB: Sport England's Playing Field Policy has specific requirements for any development affecting playing field land, there is no 'very special circumstance' test.

Sport England would like to advise that we do not support measures to meet wildlife enhancements or biodiversity net gain schemes which impact the use of playing fields. Whilst such measures may not require the benefit of planning permission, where these affect playing fields, Sport England's advice should be sought.

EVIDENCE BASE:

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Paras 98 and 103 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful

evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

PfE J7-P7 relates to a 'standards based' approach to the provision of sports facilities and is not supported by Sport England.

Sport England would advise that a 'standards based' approach is not used for the delivery of sporting facilities and that this should be clearly identified as a needs-based approach in policy wording. We would welcome a policy that aims to maintain and enhance a network of high-quality open spaces, including those that provide opportunities for sport, physical activity and recreation, private and public. Policy should recognise the role of sport in contributing to a wide range of spatial planning issues including; regeneration, health promotion, crime reduction, quality of life, engaging with colleagues in sports development, education and public health and should identify and plan positively for where sport and recreation can contribute to spatial planning initiatives such as greenspace networks or enhance the urban fringe (and Green Belts) through the location of appropriate facilities.

All playing fields are a finite resource protected by paragraph 104 of the NPPF and Sport England's Playing Fields Policy.

Trafford is in the process of drafting a Playing Pitch and Outdoor Sport Strategy as part of its Local Plan evidence base and this should be used to inform planning decisions and assessments of playing field land.

DESIGN:

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

SPORTS FACILITY DEMAND:

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

Sport England's Playing Pitch Calculators and sports facility planning tools are available to assist with this process and access can be provided on request.

ACTIVE DESIGN:

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design#activedesignguidancedraftconsultation-19692>

Helpful Links:

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Get Active: a strategy for the future of sport and physical activity

<https://www.gov.uk/government/publications/get-active-a-strategy-for-the-future-of-sport-and-physical-activity/get-active-a-strategy-for-the-future-of-sport-and-physical-activity>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

I hope the above is of assistance. If you need any further advice, please do not hesitate to contact Sport England via [REDACTED]

Yours sincerely

Pauline Shearer MSc BA(Hons) MRTPI
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Warburton Neighbourhood Development Plan

Regulation 16 Representations on behalf of Redrow Homes

On behalf of **Redrow Homes**

Project Ref: 333102333 | Rev: A | Date: May 2025

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For and on behalf of Stantec UK Limited				

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1 Introduction

Overview

- 1.1.1 These representations are submitted to Warburton Parish Council (hereafter referred to as the 'the Parish Council') on behalf of our Client, Redrow Homes, in response to the Parish Council's Regulation 16 Consultation on the Submission Draft Warburton Neighbourhood Development Plan 2025 – 2039 (the "W NDP") which was published for consultation on 15th April 2025.
- 1.1.2 The consultation runs until 3rd June 2025 and comprises **six** documents:
- Warburton Neighbourhood Development Plan 2025 – 2039 (Submission Version)
 - Warburton Design Guidance and Codes (Appendix 4 of the W NDP)
 - Warburton Neighbourhood Development Plan 2025 – 2039 Consultation Statement
 - Warburton Neighbourhood Development Plan 2025 – 2039 Basic Conditions Statement
 - Warburton Neighbourhood Development Plan 2025 – 2039 Habitats Regulations Screening Report
 - Warburton Neighbourhood Development Plan 2025 – 2039 Strategic Environmental Assessment Screening Report.
- 1.1.3 The Neighbourhood Plan area comprises a 1,153ha parcel of land including and surrounding the village of Warburton. Redrow Homes land interests relate to the greenfield land to the north of the Neighbourhood Plan area. The majority of Redrow's interests fall within the 'Warburton Lane' area of Places for Everyone (PfE) allocation JPA30 for New Carrington (herein referred to as "Warburton Lane").
- 1.1.4 It is essential that the policies of the W NDP support the strategic policies of the Development Plan and facilitate the delivery of a sustainable and successful development at Warburton Lane which, in turn, supports the delivery of a sustainable New Carrington Development; including the delivery of significant local infrastructure. We therefore submit these representations as a critical friend with a view to assisting the Parish Council in submitting an appropriate W NDP.
- 1.1.5 These representations come further to our submission to the Regulation 14 draft of the Warburton Neighbourhood Development Plan (WW NDP) in August 2024.
- 1.1.6 We note and welcome the extent of positive changes which have been made to the W NDP since the Regulation 14 Draft in response to Redrow's changes; in particular the deletion of Policy W10 and the Warburton Lane Masterplan from the Submission Plan. Those changes are summarised at paragraph 2.18 and 2.19 of the W NDP. Our reservations in relation to the inclusion of a Design Code (Appendix 4 of the W NDP) remain similar to those set out in our Regulation 14 representations.

About Redrow Homes

- 1.1.7 Founded in 1974, Redrow Homes is a leading, premium housebuilder with a history of delivering quality housing across Trafford and the wider Greater Manchester region. Redrow employ three core themes across all their developments: creating thriving communities, building responsibly, and valuing people. This approach has earned them a distinguished reputation for constructing high-quality, attractive homes that people want to live in.

National Planning Policy Framework (NPPF, 2024)

- 1.1.8 In preparing these representations, our Client has had regard to paragraph 38 of the National Planning Policy Framework (NPPF, 2024) which writes that neighbourhood plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.
- 1.1.9 The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The relevant basic conditions are as follows:
- a. *‘having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).*
 - d. *the making of the order (or neighbourhood plan) **contributes to the achievement of sustainable development.***
 - e. *the making of the order (or neighbourhood plan) **is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).***
 - f. *the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
 - g. *prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*
- 1.1.10 As set out above, the focus of Redrow’s comments is the extent to which the WNDP will deliver sustainable development which is in conformity with the Strategic Policies of the Development Plan; specifically, the policies of the newly adopted PFE.
- 1.1.11 National Planning Guidance provides some guidance on how WNDPs can meet the basic conditions and Paragraph 74 (Reference ID: 41-074-20140306) sets out what is meant by ‘general conformity’. It states:
- When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:*
- *whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with*
 - *the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy*
 - *whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy*
 - *the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach*

Structure of Representations

- 1.1.12 In terms of our Client’s representations, this document is structured as follows:

- Section 2 will provide the context for these representations including an overview of Redrow's land interest at Warburton Lane including an overview of its adopted planning policy context and planning history; including involvement in the preparation of the WNDP.
- Section 3 will outline our Client's commentary on the draft Planning Policies within the Warburton Neighbourhood Development Plan
- Section 4 comments on the Design Guide Document, which has been removed from the Plan.
- Section 5 will provide concluding comments and will make recommendations as appropriate.

2 Redrow Context for Representations

- 2.1.1 Our Client's land interests relate to an area of land totalling approximately 44 ha off of Warburton Lane, the extent of which has been illustrated within the below plan (Figure A). Some 36 ha resides within Warburton Parish and the remainder within the Partington Parish. It is the shared aspiration of both Redrow and the Council to create a new community on the land within Redrow's control with its own sense of place, character and identity.

Existing Policy Position

- 2.1.2 The majority of Redrow's site falls within the 'Warburton Lane' area of Places for Everyone (PfE) allocation JPA30 for New Carrington and within the Warburton Parish Boundary; part of Redrow's interests sit to the north east of Warburton Lane in an area defined as Partington East within JPA30. The Warburton Lane area forms the southernmost part of the mixed use allocation at New Carrington which comprises of circa 5,000 homes and 350,000spm of new employment space.
- 2.1.3 The location has already been identified as being a suitable location for residential development through its Allocation within the PfE. Redrow have submitted two planning applications for their land interests; a full application to the west of Warburton Lane and a hybrid application to the east of Warburton Lane. The hybrid application (to the east of Warburton Lane) comprises a full application where the Site bounds Warburton Lane at its west and an outline application to the east, to allow an element of flexibility in how the Site connects to neighbouring land parcels and the remainder of the New Carrington Allocation to the north east.
- 2.1.4 Allocation JPA30 requires that development comes forward in accordance with a masterplan that has been developed in consultation with the local community and approved by the local planning authority. The masterplan must include a phasing and delivery strategy, as required by policy JP-D1 of the PfE. Part one of Policy JPA30 requires that the masterplan will be prepared in partnership with key stakeholders to ensure the whole allocation is planned and delivered in a coordinated and comprehensive manner with proportionate contributions to fund necessary infrastructure.
- 2.1.5 The focus of the Council at the time of writing is on its Phase 1 of the NCM which concerns delivery; particularly the mapping out of infrastructure requirements and how they will be provided and funded. The Council proposed to prepare a Phase 2 of the NCM which will look at Spatial Strategy for the wider allocation and Phase 3 which will provide guidance on Design; the latter stage is likely to have interact / have regard to the Trafford Design Code, which was adopted in September 2024.
- 2.1.6 Trafford Council, with its consultants (Deloitte and WSP) are preparing a New Carrington Masterplan (NCM) which will be adopted as an SPD and will fulfil the PfE requirement for a Masterplan. Progress on the NCM continues, albeit at a slower pace than originally anticipated, with adoption now expected around Summer 2025.
- 2.1.7 Redrow are working with the Council and its consultants through its developer and landowners workshops. We understand the Parish Council party to the Masterplanning process.
- 2.1.8 The emerging NCM being prepared by the Council (along with the Policies of the PfE which it seeks to deliver) and adopted Design Code provides the overarching policy guidance which will secure the delivery of a comprehensive development across the New Carrington allocation and is necessarily the focus of Redrow in developing its proposals for Warburton Lane. Policy JPA30 of the PfE is a strategic policy which is fundamental to meeting the needs of Trafford Borough as well as being a critical regeneration piece for Greater Manchester.

Planning History

- 2.1.9 Part of the above land was subject, in 2019, to an outline planning application which was accompanied by an ES was submitted by the Applicant (98031/OUT/19) for development of up to 400 dwellings with access and infrastructure on part of the land forming the site within this EIA Scoping Report. Trafford Council cited ten reasons for refusal and a subsequent appeal (PINS Ref: APP/Q4245/W/19/3243720) was dismissed.
- 2.1.10 At the time, the development of the Site was not supported by the Development Plan which weighed against the development. However, as part of the appeal, the Inspector concluded that the scheme did not meet its affordable housing requirement and harm arising from that shortfall, combined with harm on the landscape and some designated and non-designated built (above-ground) heritage assets, weighed against the scheme.
- 2.1.11 In December 2024, Redrow submitted two planning applications relating to land at Warburton Lane: a full planning application for the site to the west (ref. 115154/FUL/24) and a hybrid planning application for the site to the east (ref. 115155/HYB/24). Both applications have been validated by the Local Planning Authority and are currently under active consideration.
- 2.1.12 The submitted applications seek permission for the following:
- **Ref. 115154/FUL/24 – Land west of Warburton Lane:**
Full planning application for the erection of a residential development comprising 155 dwellings, along with access, open space, landscaping, highways and drainage infrastructure, and other associated works.
 - **Ref. 115155/HYB/24 – Land east of Warburton Lane:**
Hybrid planning application comprising: (A) Full planning permission for 103 dwellings, together with access, open space, landscaping, highways and drainage infrastructure, and other associated works; and (B) Outline planning permission for up to 300 dwellings, with access, open space, landscaping, highways and drainage infrastructure (with appearance reserved at the outline stage).
- 2.1.13 Both applications are accompanied by a comprehensive suite of technical reports, plans, and drawings that demonstrate the deliverability of the proposed development and its compliance with national and local policy.
- 2.1.14 A full Environmental Statement (ES) has been submitted in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), which assesses the potential for significant environmental effects arising from the proposed developments. This includes detailed assessments of landscape and visual impact, heritage assets, ecology, transport, flood risk, and other relevant considerations.
- 2.1.15 Redrow proposes a policy compliant level of affordable housing at Warburton Lane which will contribute towards the minimum 15% affordable housing requirement across the New Carrington Allocation; alongside contributing significantly (and proportionately) to the wider infrastructure requirements of New Carrington. The proposed development provides detail at its most sensitive edges and will provide decision makers with certainty as to how the landscape and heritage impacts of the development will be mitigated.
- 2.1.16 The above approach has been discussed through pre-application discussions with the LPA and through Design Review Panels via Places Matter which have provided overarching design guidance as to how the site can be brought forward to maximise the design quality of the scheme and best mitigate impacts on the landscape and heritage. Engagement with officers and stakeholders of the LPA continue as the applications progress through the determination process.

- 2.1.17 The above process was also informed by a wider public consultation which invited the local community and local stakeholders including Warburton Parish Council. Redrow have invited the Parish Council to meet to discuss its applications, and compatibility with the emerging NDP further.
- 2.1.18 The submission of these applications represents a significant step forward in bringing forward development within the New Carrington allocation (JPA30), and reflects Redrow's commitment to delivering high-quality, sustainable residential communities.

Engagement with the WNDP

- 2.1.19 As part of its Regulation 14 Representations, Redrow expressed its disappointment with the lack of consultation that the Parish Council has undertaken with Redrow during the course of preparation of the draft NDP. This was highlighted particularly given the overlap between the Parish's evidence gathering process with its participation in the aforementioned appeal at Warburton Lane (to which the Parish Council were a Rule 6 Party). We considered that the NDP and the Council's design guide (and the previously proposed master planning document) should have been prepared in co-operation with Redrow who will be delivering it.
- 2.1.20 Notwithstanding the above, Redrow welcomes the Parish's response to its Regulation 14 Representations which we say have dramatically improved the robustness of the approach taken by the NDP, in particular, through the removal of a masterplan for the Warburton Lane area of JPA30; our client's Site.
- 2.1.21 The importance of involving key stakeholders, including landowners and developers in bringing forward a masterplan for the wider area has been made clear within the PfE Allocation for New Carrington. The PfE examination demonstrated that the wider allocation is challenging with regards to viability, including delivery of physical infrastructure and social infrastructure, and relies on the delivery of a viable scheme at Warburton Lane that also delivers an enhancement in the local market conditions for New Carrington; the Parish Council have been involved in those discussions through the PfE Examination. The input of developers who will be delivering the Allocation is crucial to understanding what can be achieved at the Allocation; this includes Redrow and its sites at Warburton Lane.
- 2.1.22 Robust consultation on the NDP is a requirement of paragraph 16 of the NPPF which states that, among other things, Plans (including Neighbourhood Plans) should be shaped by early engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. As set out above, Redrow will be a necessary stakeholder which will be responsible for delivery of development at Warburton Lane.
- 2.1.23 National Planning Guidance (NPG) provides more information on consulting on, and publicising, a neighbourhood plan and notes that a qualifying body should be inclusive and open in the preparation of its neighbourhood plan and ensure that the wider community is kept fully informed of what is being proposed, is able to make their views known throughout the process, has opportunities to be actively involved in shaping the emerging neighbourhood plan and is made aware of how their views have informed the draft neighbourhood plan.
- 2.1.24 Paragraph 048 [Reference ID: 41-048-20140306] of the NPG addresses the question of whether qualifying bodies should involve other public bodies, landowners and the development industry in preparing a draft neighbourhood plan or Order. It states:

"A qualifying body must consult any of the consultation bodies whose interest it considers may be affected by the draft neighbourhood plan or Order proposal. The consultation bodies are set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should, as necessary and appropriate be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies will be better placed to

produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development. (our emphasis)

- 2.1.25 With regard to the above, we encourage the Parish Council to continue to take into consideration our comments set out within these representations and would welcome further engagement with Redrow in the preparation of its WNDP. As you will see from these representations, we consider that the preparation of a Design Code which crosses over with a Masterplan and Design Code being prepared by the LPA runs a risk of undermining the requirements of the strategic policies of the PfE and should be avoided; however, if those documents are to be produced, Redrow should be engaged for the exact reasons set out in Paragraph 048 of the NPG above.



Figure A: Redrow Homes Land Interests

3 Comments on Neighbourhood Development Plan

3.1.1 The purpose of this Section is to respond to content and policies presented within the Regulation 16 WNDP. As set out above, the intention of these comments is to ensure that the emerging policies meet the basic conditions for a WNDP. These comments, where relevant, refer to policies insofar as they might be likely to impact the delivery of Redrow's land interest as set out within Section 2 of these representations. For the avoidance of doubt, the successful, sustainable and viable delivery of development at Warburton Lane is essential for the delivery of the special policies within the PfE; particularly JPA30 'New Carrington'.

Section 2.0: A Neighbourhood Development Plan for Warburton

3.1.2 We previously made comment on Section 2, and the discrepancies between the statements made in the Warburton Archaeological and Historic Buildings Assessment Overview (references in Paragraph 2.15 of the WNDP) and the heritage presented within Map 3 of the WNDP, particularly in regards to the features described.

3.1.3 Paragraph 2.15 of the WNDP writes that the document was updated following the Regulation 14 consultation. The updated version of the Archaeological and Historic Buildings Assessment has not been published as part of the Regulation 16 consultation. In the absence of this, our previous comments remain relevant and has been repeated below for reference.

3.1.4 The Warburton Archaeological and Historic Buildings Assessment Overview is referenced in Paragraph 2.15 of the WNDP. It is not our intention to provide a commentary on that document within these representations. Redrow has provided comprehensive evidence in relation to designated and non-designated heritage assets (both above and below ground) in relation to its previous Planning Appeal (and is reviewing that information in relation to its emerging planning applications) which will take account of relevant recordings / evidence of heritage assets including, where relevant, those identified within the Parish Council's report.

3.1.5 However, the heritage referenced within Section 2 of the Assessment is not entirely consistent with the heritage presented in Map 3 of the WNDP in terms of the features described. It is also more contentious in discussing the legibility and survival of the park features.

3.1.6 The Client requests that the Assessment is reconsidered against Map 3 of the Plan and, for consistency, amended so that the two elements are aligned in their approach.

3.1.7 We also continue to suggest that reference to HS2 is omitted entirely (from the plan and its mapping) from Paragraph 2.22 as this is no longer relevant.

Section 3.0: A Portrait of Warburton

3.1.8 Our comments on Paragraph 3.4 remain appropriate as no changes have been made to this portion of the WNDP further to the Regulation 14 comments. We again request that the Parish Council consider amending the plan accordingly.

3.1.9 Paragraph 3.4 states that there is evidence that a large area of the northwest of the parish around Warburton Park was occupied by a medieval deer park, believed to date from the 1200s. It states that this is a significant heritage asset with potential for further archaeological interest. It is vital that language used in relation to heritage (a carefully considered part of planning law and policy) is accurate and clear. Warburton Park is not a designated heritage asset as reference to it as a significant heritage asset implies (such language is confusing when read alongside national guidance within the NPPF which the WNDP must have regard to (see basic condition a)). We consider that this part of the Plan should be amended to clarify

that the Warburton Park is a non-designated heritage asset of local value (this was confirmed at the previously mentioned Planning Appeal).

- 3.1.10 At paragraph 3.6 of the WNDP states that a list of Non designated Heritage Assets (NdHAs) is in the process of being adopted by Trafford Council. Appendix 3 of the WNDP replicates that draft list.
- 3.1.11 We comment on the Council's Policy W7 on Non-Designated Heritage Assets later in this chapter. However, as above, we consider that it is vital for all readers that the WNDP is clear and consistent with national policy in relation to heritage assets. The Plan should not reference the draft list prior to its adoption by Trafford Council. In the event that Trafford Council made any changes to the draft list, the WNDP would fall immediately out of date and be a confusing reference for any reader; particularly a lay reader. We suggest that reference is simply made to Trafford's list and a link provided.
- 3.1.12 For the avoidance of doubt, we consider that it is the role of local planning authorities (Trafford Council in this case) to identify (and provide a list of) non-designated heritage assets, rather than the role of the Parish or the WNDP. The WNDP should not confuse that process.

Section 4.0: Vision and Objectives

- 3.1.13 Our comments on Section 4.0 remain relevant in the absence of any amends to the WNDP within the Regulation 16 draft.
- 3.1.14 Redrow's ethos as a business, as well as their aspirations for Warburton Lane, align with the proposed social, environmental, and economic values presented in the draft Neighbourhood Development Plan. Therefore, Redrow supports Section 4.0, subject to the comments below.
- 3.1.15 Neighbourhood plans are underpinned by local and strategic policy. Paragraph 13 of the NPPF states that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies. Furthermore, basic condition e) also reiterates that neighbourhood plans should be produced in conformity with the strategic policies contained within the relevant development plan.
- 3.1.16 In this case, the draft vision and objectives closely reflect the policy requirements and reasoned justification for the PFe JPA30 strategic allocation, both of which are geared towards the delivering of sustainable development.
- 3.1.17 The Warburton Lane development aims to create a high-quality, contextually designed community with associated infrastructure that promotes active travel. Public consultation for the forthcoming applications is being prepared, and the Client is eager to maintain active communication with local stakeholders and incorporate feedback into emerging proposals. The Client's development proposals for the Warburton Lane area of the JPA30 allocation will make a positive and significant contribution to meeting the vision and objectives outlined in the draft Neighbourhood Plan.
- 3.1.18 Redrow consider that the successful delivery of Warburton Lane will play an integral role in achieving the vision outlined within the draft plan. We therefore propose that the wording of Section 4.0 is amended to incorporate and positively reference the WNDP supporting the forthcoming Warburton Lane development, in accordance with NPPF p13 and basic condition e).

Section 5.0: Planning Policies

Draft Policy W1: Conserving and Enhancing Local Landscape Character

- 3.1.19 As set out within our earlier representations, Redrow is supportive of a policy within the WNDP which considers landscape character. However, the level of protection offered to different

landscapes is set out within national policy and the WNDP must have regard to that policy approach (Basic Condition a)).

3.1.20 Paragraph 180 of the NPPF states that planning policies should contribute to and enhance the natural and local environment by:

a) ***protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);***

b) ***recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; (...)*** (our emphasis)

3.1.21 Development Plan policy should ‘protect and enhance’ landscapes where they are ‘valued landscapes’ in the meaning of the NPPF. Paragraph 34 and 39 of the aforementioned Appeal deals with whether the land around Warburton is a valued landscape and the Inspector noted that “*In this case the landscape in question includes the village of Warburton and its former deer park. This is within an Area of Landscape Protection under saved policy ENV17. However, **this designation applies to all of the landscape types that make up the open areas of the Borough. It does not indicate that the landscape around Warburton has a special quality or is anything other than of local value.***” (Our emphasis).

3.1.22 They go on to state “*Undoubtedly this is an attractive area of countryside that it is generally representative of the Settled Sandlands landscape type. Local people clearly hold it in high regard. However, I cannot agree that it is sufficiently intact or visually apparent to be of regional importance. **I do not consider that it is a valued landscape within the terms of paragraph 170 of the Framework.***” (Our emphasis).

3.1.23 This is reiterated within Paragraph 45 of the Appeal decision which states that the Inspector agreed with the Council and the Appellant that “***this landscape has medium sensitivity and medium susceptibility to change***’. There has been no material change in the baseline landscape or visual setting of the site since the Appeal Decision that would change this decision.

3.1.24 With regard to the above, we cannot agree with paragraph 5.1.1 of the WNDP which claims “*Warburton has a very distinctive landscape character*”. As outlined within our previous representations, this reference should be removed.

3.1.25 Whilst it is therefore the requirement of the NPPF that the intrinsic value of the landscape is recognised (and policy encourages that the landscape is enhanced), it is not compatible with national policy that Policy W1 requires protection or ‘conservation’ of the landscape as per the title of draft Policy W1. We suggest that the policy is re-titled to ‘Respecting Local Landscape Character’.

3.1.26 Our same objection falls to the part of W1 which requires “All proposals **should have regard to the design principles for Landscape and Views** set out in Part 3.3 of the Warburton Design Guidance and Codes

3.1.27 Those design principles in Part 3 of the Warburton Masterplan and Design Guide state:

“• ***Future development should aim to protect and enhance the key characteristics of the Landscape character areas that it falls within.***

• ***Key view corridors should be preserved. Where proposals could impact on views, design responses such as lower building heights or screening using vegetation can be used to reduce the visual impact of development on the landscape.***”

- 3.1.28 As above, we object to a policy mechanism that requires the protection of characteristics within the landscape where they are not defined as being of any particular value in planning terms; we consider that the policy wording of W1 combined with the Design Principles in Part 3 seek to achieve that and this reference to the design guide should be deleted. Inadequate assessment of landscape sensitivity and the sensitivity of visual receptors is included in the WNDP to support any such policy.
- 3.1.29 We support Policy W1 where it requires development proposals recognise and respond positively to the intrinsic local landscape character of the Warburton neighbourhood plan area. We also support the principle that landscape proposals should be sympathetic and appropriate to the relevant Landscape Character Type.
- 3.1.30 However, we consider that the landscape character type is adequately defined by existing landscape character assessments which have been referenced within the supportive text of the WNDP. We do not support the WNDP reference to landscape features being identified within the Landscape Character Assessment for Warburton.
- 3.1.31 The supporting Landscape Character Assessment makes generalised sweeping statements about landscape sensitivity, that are not reconciled against a clear methodology for different levels of sensitivity (e.g. low/medium/high), nor do they stipulate what types of development these landscapes may be sensitive to. Phrases such as 'exceptionally high sensitivity' are used throughout the document, which are contradictory to the true landscape sensitivity of the area.
- 3.1.32 Indeed, as the sensitivity of the landscape at Warburton was considered at the aforementioned appeal which, as noted above, concluded that this landscape has medium sensitivity and medium susceptibility to change; a conclusion shared by both Redrow and Trafford Council.
- 3.1.33 Guidance for Landscape and Visual Impact Assessment (GLVIA3), is clear in that landscape sensitivity is an assessment to value and susceptibility to the proposed type of change. The starting point for understanding landscape value is GLVIA3 and Technical Guidance Note 02/21 (Assessing of Value Outside of National Designation), neither of which are referenced within the WNDP Landscape Character Assessment. If it is to include a landscape sensitivity assessment then it must confirm what indicators of value have informed these assessments, along with an assessment of susceptibility to specific development types.
- 3.1.34 The current Landscape Character Assessment is not fit for purpose as it currently stands, and has the potential to inform unreasonable development in the decision-making process if not properly addressed.
- 3.1.35 As above, we consider that sufficient robust evidence exists in defining landscape character areas which can be referenced and given suitable weight in decision making by Policy W1 of the WNDP. Reference to its own Landscape Character Assessment undermines the ability of the Plan to robustly plan for, and engage with, developing landscape proposals.
- 3.1.36 The Regulation 16 draft of the WNDP has introduced an additional section to Policy W1 relating to the introduction of a '*substantial landscape buffer along the southern boundary of the Warburton Lane parcels*'. It goes on to write that in this case, a '*30m belt of woodland would be the minimum requirement to retain the boundary to the Green Belt by Coroners Wood*'. This wording has been carried over from the now-deleted Policy W10. While we support the removal of Policy W10, we do not agree with the incorporation of this requirement into Policy W1, for the reasons outlined below.
- 3.1.37 The requirements for a substantial landscape buffer to the south of the allocation is set out within Policy JPA30 of the PfE and it is therefore unnecessary for Policy W1 to duplicate the strategic policy; the former deer park forms part of that southern boundary. There is no requirement within the PfE to reduce the density of a scheme to accommodate such a buffer,

indeed, the PfE sets an assumed density (25 dph) for the Site alongside a requirement for a buffer.

3.1.38 The details of the buffer should be determined by a development proposal with full regard to a landscape and visual impact assessment (LVIA) prepared by the Applicant. It is not clear where the proposed requirement for a *'30m belt of woodland would be the minimum requirement to retain the boundary to the Green Belt by Coroners Wood'* has arisen; however it is not justified. In the first instance, Coroners Wood is not the current boundary of the Green Belt so cannot be maintained; the boundary of the Green Belt is at the southern extent of the Allocation JPA30. A landscape buffer to the Allocation must be developed alongside a comprehensive development strategy which includes landscape and visual impacts as well as heritage. For example, the boundary of the allocation along Moss Lane will inevitably require an element of interaction with development which exists along Moss Lane already and a management of development as it changes to the rural. It is unlikely to be appropriate for the edge of development here to be dealt with via an arbitrary 30m landscape buffer which would prevent that transition in a sympathetic way, including excluding some existing development from its surroundings.

3.1.39 With regard to the above, Redrow objects to this section of Policy W1 in its entirety, and maintain that this requirement should be removed for the reasons set out above.

Draft Policy W2: Warburton Deer Park

3.1.40 As stated in our previous representations, we object to the approach taken by Policy W2 and consider it conflicts with the development plan and national planning policy which provides guidance on how non-designated heritage assets should be considered. These comments still remain relevant in the absence of any updates through the Regulation 16 version.

3.1.41 Draft Policy W2 states that development proposals *"will be **required to reflect and respond to the historic landscape assets** within and on the park boundary **identified on Map 3 Heritage and Landscape Assets** related to Warburton Medieval Deer Park"*. (our emphasis)

3.1.42 In the first instance, the protection of non-heritage assets is adequately accounted for within the NPPF. In relation to the former deer park, Policy JPA30 Part 33 requires development to *"Take appropriate account of relevant heritage assets and their settings, including the Warburton Deer Park, listed buildings and areas of high archaeological potential in the south west of the site, in accordance with Policy JP-P2"*. It is not considered necessary for Policy W2 to seek to apply a further level of policy here.

3.1.43 Indeed, we consider that the policy requirement within JPA30 (and the NPPF) which requires development to 'take account of the significance' of a non-designated heritage asset is correct. The WNDP proposed approach of requiring development to 'reflect and respond' to a list of assets (we would say more accurately described as attributes, such as fishponds) is confusing and at odds with what national policy requires of development.

3.1.44 Indeed, Redrow disagrees with the identification of some of the heritage and landscape features listed within draft Policy W2 (and the WNDP Map 3 and glossary), as there is no evidence base supporting the Parish Council's decision to include these assets within the list. This is inconsistent with NPPF Paragraphs 198 and 201 which requires the production of the inclusion of an *'up-to-date evidence base'*.

3.1.45 Paragraph 209 also requires a planning balance to be applied when considering the impact of a proposal on the significance of non-designated heritage assets. Without robust evidence supporting the inclusion of these assets, it is unclear what the important elements of the assets are in landscape and heritage terms, making it impossible to apply a fair and accurate planning balance judgement. To include those references which would undermine the application of national policy would fail to meet basic condition a).

- 3.1.46 This also raises doubts as to whether they are indeed extant. To have a policy that requires development proposals *'to reflect and respond to the historic landscape assets'*, those assets would need to be present, with good documentary and / or archaeological evidence.
- 3.1.47 Non designated heritage assets are defined in the WNDP glossary; however, the above tests do not appear to have been applied to the assets contained within the Map 3 list. Furthermore, the assets contained within Map 3 do not accord with the historic environment record entry, and do not reflect the Warburton Archaeological and Historic Buildings Assessment Overview report referenced in Section 2.
- 3.1.48 We object to reference within Policy W2 to the deer park as being a historic 'landscape' asset. As set out earlier within these representations, the former Warburton Deer Park sits within an Area of Landscape Protection under saved Policy ENV17. This policy applies to all landscape types that make up the open areas within the Borough, and so it does not attach any special quality or local value to Warburton Deer Park in landscape terms.
- 3.1.49 With regard to the above, we suggest that Policy W2 fails to meet the basis conditions and should be deleted. Notwithstanding that, we do accept that planning policy should require development to take account of non-designated heritage assets such as the former Warburton Deer Park (which the NPPF and PfE Policy do require). If the WNDP is to retain Policy W2, we suggest that the policy reflects the approach taken in existing policy and avoids seeking to apply undue protection to individual features with unevidenced significance.

Draft Policy W3: Protecting and Enhancing Wildlife

- 3.1.50 Redrow supports the principle aims of Policy W3. However, we do object to the inclusion of Maps 4 and 5 (and reference to them) within the Policy which identify areas of 'high distinctiveness habitats' and Wildlife Corridors. The below comments were set out within our Regulation 14 representations and still remain relevant.
- 3.1.51 As with landscape, it is important that terminology and the importance which is applied to the hierarchy of habitats is consistent with national and international policy. Paragraph 181 requires plans should distinguish between the hierarchy of international, national and locally designated sites. We note that the LPA had a similar difficulty with the confusion of terminology in relation to distinctiveness of habitats in relation the Informal consultation on the WNDP in June 2023.
- 3.1.52 Whilst the habitats in Map 4 may be 'distinctive' (we do not seek to comment on whether they are or not) the proper assessment of the ecological value of a Site should be undertaken within 2 years of considering a proposal. The information contained within Map 4 would be out of date by virtue of time elapsed quickly after adoption of the plan. Instead, we would support a policy requirement which requires development to assess the habitats and their importance.
- 3.1.53 Whilst we support the principle of ecological enhancement and biodiversity net gain, we also consider that the correct mitigation measures to achieve that are best determined on a case-by-case basis and through liaison with a suitably qualified ecologist.
- 3.1.54 The latter paragraphs of Policy W3 are too prescriptive as to how ecological enhancement is to take place. Bearing in mind that the policy requires avoidance of 'important' habitat and a 10% BNG is a legal requirement, it is not necessary therefore to seek to stipulate where gains should be made and with what types of habitat. This can, and should, be determined on a case-by-case basis following the advice of a suitably qualified ecologist responding to an up to date assessment of the Site in question. We do support reference to the mitigation hierarchy within the Policy.
- 3.1.55 The Wildlife Corridors presented within Map 5 extend further to that shown within adopted Core Strategy Policy R2. The Protecting and Enhancing Warburton's Natural Environment evidence base states that a 15 metre buffer has been placed to protect the 'notable habitats'

shown within Map 4. This includes a triangular parcel of land north of Red Brook and south of Chapel Lane. This is within Redrow ownership and sits within the New Carrington Masterplan area. We note that this parcel sits outside of the WNDP plan area; the Parish should avoid prescribing development or identifying constraints here (indeed, we do not consider that it is at liberty to do so).

- 3.1.56 In any case, Natural England Guidance¹ writes that a buffer zone of 15 metres should only be applied to Ancient Woodland, which is defined within the Standing Advice as being an 'irreplaceable habitat'. While we accept this area is of some value, we do not agree that it constitutes irreplaceable habitat, and if the parish were to define it as this, sufficient site-specific evidence relating to the age, uniqueness, species diversity and rarity should be supplied in line with the NPPG on irreplaceable habitats² to justify this weighting. No such evidence has been provided.
- 3.1.57 We have no objection to the suggestions set out within the latter 2 paragraphs of Policy W3 being relocated to the supporting text.

Draft Policy W5: Responding to Local Character

- 3.1.58 The Client agrees that development proposals should be responsive to local character, especially as Policy JPA30 requires this of development proposals. In particular, that development (Part 32) respects the urban/rural fringe setting in the design of the development, in terms of its height, scale and siting, and demonstrate high standards of design.
- 3.1.59 However, the object to the wording of Policy W5 (Part 2) which requires development proposals within allocation area JPA30 to '*respond positively to Warburton Design Guidance and Codes Part 4.3.1 Using Historic Farmstead Character to Guide Design*'. Although the wording of Policy W5 has been revised, the underlying principles (and our concerns) remain unchanged and have been reiterated below.
- 3.1.60 The Warburton Masterplan Design Guidance (WMDG) seeks to apply principles which are overly prescriptive development. Part 3 of the WMDG notes, for example, the following Design Principles at section 3.1:
- *Responding to Warburton's typical housing densities and the spacing between dwellings could result in developments that are more in keeping with local character."*
- 3.1.61 The intent of the Plan, as drafted, would be to apply the above principles to development at Warburton Lane. However, such an approach would conflict with (basic condition e) and fail to take into account that PfE JPA30 directs development of a density of 25 dwellings per hectare to the Warburton Lane area; that density must be applied across Warburton Lane to create a new place and simply cannot replicate Warburton's typical rural housing densities (albeit policies in the PfE and the requirement of W5 to respond to rural character would enable such an approach on important edges of the development on the new urban / rural fringe).
- 3.1.62 Similarly, we object to the requirement for development to respond positively to 'Part 4.3.1 Using Historic Farmstead Character to Guide Design'. Notwithstanding our comments in relation to density, it would not be considered desirable to replicate building and layout forms of agricultural buildings across the allocation area at Warburton Lane. The distinctive character of a farmstead landscape comes from the historically isolated nature of the buildings within it (by their nature they are surrounded by farmland), and so it is not possible to scale up historic farmsteads on significant development Sites, such as at Warburton Lane. Using this as a point of reference not only contradicts with the 25dph development parameters set out within PfE JPA30, but it also would undermine the ability of the site to actually provide a development which responds meaningfully to its surroundings. Furthermore, such an

¹ [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions)

² <https://www.gov.uk/guidance/irreplaceable-habitats#what-irreplaceable-habitats-are>

approach would fail to make efficient use of land and would be unsustainable in that regard, contrary to basic condition d). Redrow therefore objects to the wording of this policy.

3.1.63 We note that Trafford Council's response to the informal consultation on the WNDP stated

*"Whilst the reasoning behind this proposal is set out within the Masterplan it is considered that requiring development proposals (through policy) to demonstrate / apply the principles set out in Part 5.3 of the Warburton Masterplan & Design Guide relating to using Historic Farmstead Character to guide design is **overly restrictive and not an appropriate approach for all development proposals** (particularly smaller developments of less than 5 units)."*

3.1.64 Part 3 of Policy W5 is relevant to all parts of the Plan area. The Client is supportive of its approach to Building Heights and Roof Forms as well as Materials and Detailing. Policy W5 requires developers to have regard to these local features which is appropriate.

3.1.65 Similarly, the Client agrees with Part 4, which states that high quality contemporary designs should be supported where they respect local context and character. Redrow take a view that this can be achieved in a creative manner, without directly replicating existing development.

Draft Policy W6: Protecting Heritage Assets

3.1.66 As stated in our previous representations, designated heritage assets and their settings are already appropriately protected through national planning policy. Paragraph 16 of the NPPF restricts the '*unnecessary duplication of policies*', and so the Client object to this element of the policy on this basis.

3.1.67 Moreover, the Policy W6 still seeks to introduce design principles contained within the WMDG (Part 3.2) to respond to heritage assets. The content of Part 3.2 of the WMDG is high level and prescriptive as to how impacts on heritage assets are to be mitigated. The combination of the summary approach within Policy W6 and the prescriptive approach within Part 3.2 serves to undermine the careful approach of assessing, understanding and responding to a heritage assets significance (and managing any harm to heritage assets) which is set out within the NPPF. The policy is likely to undermine the effectiveness of applying that national policy fails the basic condition a).

3.1.68 Redrow considers, therefore that Policy W6 should be removed in its entirety.

3.1.69 In addition, we take specific issue with reference to cumulative impacts. Paragraph 13 of the Historic Environment NPG writes that '*local planning authorities may need to consider the implications of cumulative change*'. This responsibility is therefore with Trafford Council, not the Parish Council to set out.

Draft Policy W7: Non-Designated Heritage Assets

3.1.70 The Regulation 16 update to the WNDP does not present updated wording or approach to Policy W7, and so our Client's objections still stand.

3.1.71 As referenced above, the WNDP needs to be clear as to the status of the list of buildings and structures at Appendix 3. Policy W7 states that they are identified as non-designated heritage assets, but earlier parts of the Plan state that the list reflects non-designated heritage asset 'candidates' which are to be considered by Trafford Council (and adopted or otherwise). The WNDP should make clear which eventuality is the case.

3.1.72 Notwithstanding, we suggest that for clarity, the WNDP references only (and does not seek to replicate) any list of non-designated heritage assets such that there is no ambiguity as to where the responsibility for maintain such a list falls (with the LPA) or possibility that the list is then updated by the LPA and falls out of date within the WNDP.

- 3.1.73 The Client raises no objection to the candidate list as is it is presented but the WNDP should not confuse the role of the LPA in keeping a list of heritage assets.
- 3.1.74 We have no objection to reference to the PfE in assessing development proposals affecting non-designated heritage assets; albeit we do not consider it is necessary to replicate existing policy. If the PfE policy is to be referenced, we suggest that for completeness, the NPPF should equally be referenced. As the NPPF currently stands, the implications of a proposal on the significance of non-designated heritage assets, *'a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'* (Paragraph 209 of the NPPF).

Draft Policy W9: Archaeology

- 3.1.75 Again, the Regulation 16 version of the WNDP fails to address the comments raised in our previous representations. These have been reiterated below.
- 3.1.76 NPPF Paragraph 203 recognises the desirability of sustaining and enhancing the significance of heritage assets (including those with archaeological interest), however there is no strict requirement for development proposals to *'enhance'* said asset, nor does national policy require the preservation of *'potential'* assets, as currently detailed in draft Policy W9.
- 3.1.77 Furthermore, the final sentence of the policy writes *'lack of current evidence of sub-surface archaeology must not be taken as proof of absence'*. The lack of current evidence is routinely taken as proof (or a strong indication) of absence, and national planning policy does not indicate otherwise.
- 3.1.78 Instead, development proposals should be determined in accordance with paragraph 200 of the NPPF, which sets out that the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact.
- 3.1.79 Contrary to basic condition a) which requires conformity with national planning policies and guidance, the level of protection and enhancement specified within Draft Policy W9 therefore exceeds the requirements set out within Section 16 (including Paragraph 200) of the NPPF. The Client therefore requests that the policy wording is revised to align with national planning policy.

Draft Policy W10: Sustainable Design and Climate Change

- 3.1.80 Redrow supports the strive to promote sustainable practices that are resource and energy efficient and resilient to climate change. However, these principles are already controlled within strategic and national planning policy, and so there is no need for the duplication of these through Policy W10, as outlined within Paragraph 16 of the NPPF.

Draft Policy W12: Walking and Cycling

- 3.1.81 It is important for vehicular and active travel routes to not only consider movement across the parish but also across the wider New Carrington area and beyond. Using a robust evidence base of technical assessments, the emerging New Carrington Masterplan document has reviewed and responded to movement networks in a holistic manner through the forthcoming plan. It is vital for any WNDP to be underpinned by this.
- 3.1.82 Planning Obligations Guidance (paragraph 23b-002-20190901) specifies that obligations may only be sought where they meet the tests that are necessary to make the development acceptable in planning terms. They must be:
- *'necessary to make the development acceptable in planning terms;*

- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development’.*

3.1.83 We therefore reject any request for contributions for infrastructure that are not directly related to development of Redrow’s land interests, are not necessary to make the development proposals acceptable in planning terms or are not fairly and reasonably related in scale and kind to the development.

3.1.84 For example, Policy W11 seeks to encourage the (through developer contributions) improvement to existing pavements and ongoing maintenance (the extent of which is unclear), new welcoming roadside signage, a signposted heritage trail and a celebratory village centre sign and improved access to parking facilities at existing village assets. These items all relate to existing issues which exist within the parish or desires of the parish council currently; it is not clear how these matters relate to proposed development at all and therefore how they would comply with the tests above.

3.1.85 We do note the Parish’s requirements for new speed limits and road markings at key junctions. Any development at Warburton Lane will need to provide suitable access to the development as well as mitigate any off site impacts it might have however those must be limited to changes required to make the development acceptable in planning terms.

Local Green Space W12

3.1.86 The two proposed Local Green Spaces (LGS) relevant to the Client’s are ‘W12/2 Coroner’s Wood’ and ‘W12/6 Land off Moss Lane and adjacent to Warburton Lane’. As stated within our previous representations, Redrow object to the Local Green Space designation within both of these areas.

3.1.87 We have written directly to the Council in relation to those proposals setting out our objections. A summary of those objections are set out below.

3.1.88 In relation to W12/2, the Client does not consider that this Local Green Space accords with paragraph 106 of the NPPF which sets out the circumstances for designating Local Green Spaces. The policy is a restrictive policy and states that it should ‘only’ be used where green space meets all of the tests within paragraph 106; as set out below:

‘The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.’

3.1.89 We do not consider that W12/2 meets any of the above criteria. The WNDP and its boundary relates to the residents of Warburton, however the proposed LGS W12/2 serves the residents of Partington and the residents along Oak Road. These residents are not part of Warburton, are not included within the WNDP boundary and are not served by the Parish Council or its Development Plan. Indeed, residents of Partington have no say in the adoption of the WNDP and will not be consulted as part of the referendum to do so. It is therefore unclear how the ‘local significance’ of this space has been assessed in relation to said residents. Notwithstanding this, Redrow do not consider that the parcel of land is demonstrably special to the local community or holds a particular local significance.

- 3.1.90 The area highlighted in W12/2 is not accessible to the public and it is difficult to understand how the land is enjoyed as a place of tranquillity. The land is separated from a PRow to the north of W12/2 by the Red Brook which provides ready enjoyment of that tract of land and is protected by its status as a PRow; but this is not to be confused with land to the south of the Red Brook (which W12/2 seeks to designate) which is not publicly accessible. The stretch of woodland which can be enjoyed (by views across the brook) from the PRow is not ancient woodland nor is it considered to provide important views in relation to heritage assets.
- 3.1.91 The proposed LGS has been assessed as part of a previous planning appeal (APP/Q4245/W/19/3243720) which considered the importance of the landscape in the context of its wider setting and in the context of the former deer park. Here, the inspector concluded that notwithstanding the value which local people placed on the entire landscape surrounding Warburton, its characteristics were insufficient to be considered as a 'valued landscape'. Similarly, despite the value that local evidence places on the importance of the heritage value of the former deer park the Inspector did not appear to share those views.
- 3.1.92 We do not dispute that parts of W12/2 are of value visually, arboriculturally and ecologically (and that local people value those attributes), however, we consider that there is insufficient evidence to demonstrate that those features are 'demonstrably special to the local community' or that they hold a 'particular local significance' due to any of those attributes; both of those tests must be passed for such a designation to be made and for designation as LGS to be justified.
- 3.1.93 Lastly, part c) of paragraph 106 of the NPPF requires that the land in question is not an extensive tract of land. We consider that the land is, indeed, an extensive 'tract' of land. The land in question bounds the entire length of the southern boundary of Partington on the west of Warburton Lane. None of which is publicly accessible and the majority of which cannot be experienced or meaningfully enjoyed from publicly available viewpoints.
- 3.1.94 Planning practice guidance (reference 37-005-20140306) set out that the purpose of a LGS designation is a way to provide special protection against development for green areas of particular importance to local communities. Notwithstanding the above, we consider that the proposed designation W12/2 would be objectional because such a designation would be in conflict with other areas of the Development Plan, including JPA30.
- 3.1.95 The requirement of paragraph 107 of the NPPF that LGS designations are to be treated as Green Belt for the purposes of policy making (and de facto for decision making) would clash with JPA30. This land cannot be kept open and will necessarily be bound by development. Indeed, Planning Guidance (paragraph 37-007-20140306) specifies that '*designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.*'
- 3.1.96 As demonstrated by the extensive development control criteria within PfE Allocation JPA30 (New Carrington) and through the above mentioned appeal, the development management process contains adequate policies to safeguard and mitigate any harm to any attributes of conservation value at the Site, whether that is landscape, arboriculture, heritage or ecological value. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as LGS. So, whilst the Client does not support the designation of W12/2, Redrow do not consider that it is necessary in any case.

Local Green Space W12/6

- 3.1.97 The Client disagrees that the area is capable of satisfying part b) of NPPF paragraph 106. The area may be capable of forming part of the setting of a heritage asset, but as such, its value to

the significance of the heritage asset would be protected by policy and statute. It is not necessary for it to be otherwise protected.

3.1.98 Save for that, that value attributed to W12/6 appears to be on the basis of it providing for views across the Moss and towards Warburton when existing Partington or travelling along Moss Lane. The LGS designation is intended to protect land which itself is of special value or significance, which this land is not. The land highlighted is, essentially a highway verge and contains none of the listed attributes listed in paragraph 106 of the NPPF.

3.1.99 Notwithstanding the above, it is considered that designation of the land would also conflict with the policies of the PfE. The land proposed for inclusion in W12/6 is within the boundary of JPA30, which is excluded from the Green Belt. It would be perverse in logic for a planning policy which allocates a Site outside of the Green Belt to sit side by side with a policy which re-introduces the effect of the Green Belt.

Draft Policy W15: Community Facilities

3.1.100 The delivery of PfE JPA30 will make an important and significant contribution to community facilities within the New Carrington Area, including the Warburton Parish.

3.1.101 Parts 14 to 16 of the allocation policy states that this includes the introduction of a new local centre, neighbourhood centre, and financial contributions for an offsite school. While these may not be physically delivered within the parish, the community benefits will be experienced across the wider vicinity. The NCM will provide further guidance on the location of community facilities within the Parish which will be provided in association with the wider New Carrington Allocation. The delivery of those facilities further underlines the need for a comprehensive approach to the New Carrington Masterplan as a whole.

4 Warburton Masterplan and Design Guide

- 4.1.1 Paragraph 2.18 of the Warburton Masterplan and Design sets out that the previously drafted WMDG will no longer form part of the WNDP but will be retained as a separate document, background document for the WNDP evidence base, and will be used to inform the Parish Council's response to the emerging NCM consultation. The Warburton Design Guidance and Codes (as amended) has been retained as an appendix to the WNDP. We provide comment on this below.
- 4.1.2 The Client supports the removal of the Warburton Masterplan from the WNDP on the basis that it will not be considered a material consideration for planning purposes.
- 4.1.3 Its inclusion would have risked undermining the requirements set out in PfE Policy JPA30, which mandates the preparation and implementation of the wider New Carrington Masterplan (NCM) currently being developed by Trafford Council. The potential for conflict between the two documents and the preparation of the WMDG without regard to the NCM or engagement with landowners or developers would have fundamentally undermined the master planning process further. It is therefore vital that it was removed.

Warburton Design Guidance and Codes (Appendix 4)

- 4.1.4 Comments relating to Section 3, 4 and 5 of the draft document are enclosed below:

Comments on Section 3: Neighbourhood Area Context Analysis
- 4.1.5 As set out previously, Redrow do not object to the general design principles and the supporting analysis presented within Section 3 of the design guide and are pleased to see that that their forthcoming development proposals at Warburton Lane naturally reflect much of the design guidance presented here.
- 4.1.6 However, whilst the context from design decisions may be helpfully set by the document, planning policy and guidance requires that design guides 'guide' development without being overly restrictive as this could stifle creativity and constrain better, more contextually responsive, well designed development proposals coming forward.
- 4.1.7 The policy wording of PfE JPA30 allows forthcoming development proposals a reasonable degree of flexibility in regard to their design. While key requirements and development parameters are outlined, there is still scope for developers to adapt to changing conditions and site-specific considerations.

Comments on Section 4: Masterplan and Design Principles

- 4.1.8 The Regulation 14 version of the Design Guide included prescriptive and overly restrictive requirements specific to the WNDP area. These went well beyond what is expected at a strategic level and were inconsistent with policy JPA30. Notable examples included a 30-metre landscape buffer, directives on specific land uses, indicative housing numbers, and detailed Masterplanning options. We therefore support the decision to remove these elements.

Redrow has no objection to the inclusion of guidance presented within Section 4, provided it remains advisory and indicative in nature, intended to inform development rather than to impose rigid requirements.

- 4.1.9 A homogenous approach to design cannot be applied across the whole Warburton Parish, as the policy context and setting of the Parish varies significantly. Notably, the rural setting of the Green Belt, the sub-urban setting of strategic allocation of JPA30, and the urban setting of

Warburton and Partington edge that adjoins, and is significantly influenced by, the main urban area.

5 Summary

- 5.1.1 These representations are submitted on behalf of Redrow Homes in relation to their land interests at Warburton Lane. They build on the points raised during the Regulation 14 consultation, particularly in highlighting areas where additional clarity is needed and where some policies may be inconsistent or overlapping and would benefit from refinement.
- 5.1.2 We welcome the progress made in the Regulation 16 version of the WNDP and are pleased that many of our earlier recommendations have been acknowledged. However, we remain concerned that certain aspects of the Design Guidance and Codes could still give rise to potential conflicts. The WNDP as drafted still fundamentally risks undermining the delivery of development at Warburton Lane and, therefore, the wider New Carrington Allocation. The WNDP therefore, fails to meet the basic conditions for an WNDP, particularly condition a) having regard for national policies, d) delivery of sustainable development and e) conflict with strategic policies.
- 5.1.3 We suggest that a further review of the WNDP would be beneficial for all parties. Redrow remains committed to engaging constructively in the process and would welcome the opportunity to meet with the working group to discuss the content of this representation and explore ways to address our outstanding concerns.



Draft Warburton Neighbourhood Development Plan 2025 – 2039

Regulation 16 Consultation Response Form

Warburton Parish was formally designated by Trafford Council as a 'Neighbourhood Plan Area' in March 2019.

Warburton Parish Council submitted the draft Warburton Neighbourhood Development Plan (WNDP) 2025-2039 to the council on 28th February 2025.

The submission from Warburton Parish Council includes:

- Final submission letter
- WNP Submission NDP
- Appendix 4: Design Guidance and Codes
- Basic Conditions Statement
- Consultation Statement
- HRA Screening Report Updated Feb 25
- SEA Screening Report Updated Feb 25

These documents can be accessed online and a paper copy is available at Partington Library or on request (please contact Strategic Planning).

Trafford Council is carrying out a consultation from **Tuesday 15th April until Tuesday 3rd June 2025** and is inviting comments on the submitted plan.

Following the Consultation, the comments received will be passed to an independent examiner, to be appointed by Trafford Council, who will consider the representations and determine if the draft Plan should be put to a community referendum.

Data protection

We maintain a database of consultees who wish to be kept informed about planning policy matters such as the Local Plan. Individuals or organisations that would like to be added to or removed from our consultation database should email strategic.planning@trafford.gov.uk or contact us by telephone on [0161 912 3149](tel:01619123149).

In responding to consultations your contact details will automatically be added to the consultation database (if not already held). However, we will not automatically notify you of future consultations unless you 'opt in' on your consultation response.

If you do not state you want to be on the consultation database, it will be assumed that you do not wish to be notified of future consultations.

All comments received during Strategic Planning consultations will be held by us for the production of the document that is being consulted on and they will be available to view publicly (including on our website). Comments cannot be treated as confidential. Your personal information such as your postal and email address will not be published, but your name and organisation (if relevant) will.

 The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.

This form is an editable PDF document and you can type in your comments and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.

Alternatively, completed comment forms can be returned by post to the address below:

Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Contact Details

Name:

Organisation (if applicable):

Address:

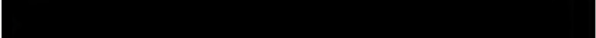
Postcode:

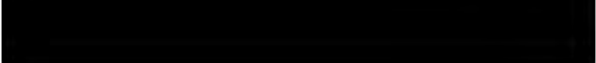
Email:

Agent name (if applicable):

Organisation (if applicable):

Address: 

Postcode: 

Email: 

Question 1

Do you support, oppose or have general comments about the plan?

Support

Object

General Comment

Please provide your comments below - continue on to a separate sheet if required. If you are objecting, please set out what changes you consider are necessary to ensure the plan meets the [Basic Conditions](#).

Please see attached representations document.

Question 2

Would you like to be notified of Trafford Council's decision to 'make' the Warburton Neighbourhood Development Plan?

Yes No

Question 3

Do you wish to be added to the consultation database and kept informed about planning policy matters such as the Local Plan?

Yes No



The Coal
Authority



W: www.gov.uk/coalauthority

For the attention of: The Strategic Planning and Growth Team

Trafford Metropolitan Borough Council

[By email: strategic.planning@trafford.gov.uk]

7 May 2025

Dear The Strategic Planning and Growth Team

**Re: Draft Warburton Neighbourhood Development Plan 2025-2039 Regulation 16
Consultation**

Thank you for your notification of 15 April 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

However, the area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make.

Yours

The Coal Authority Planning Team

[REDACTED]

From: Natalie Addison
Sent: 03 June 2025 14:28
To: Strategic Planning; [REDACTED]
Cc: [REDACTED]
Subject: RE: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

STOP! This email has originated from outside of Trafford Council, If you **DO NOT** recognise the sender or are not expecting this email, **DO NOT** click on links or attachments.

Good afternoon Strategic Planning,

Thank you providing TfGM the opportunity to review and provide comments on the Draft Warburton Neighbourhood Plan. Please see below bullet points following our review:

- TfGM supports the active travel aspirations for the area, specifically linking into the existing and proposed network of the New Carrington development.
- TfGM welcomes any future discussions on public transport provision, specifically bus services.
- The Policy should integrate its priorities with Trafford Council's Walking, Wheeling, and Cycling Strategy.
- TfGM supports alignments of the Plan with the New Carrington development.

Many thanks,
Natalie

[REDACTED]

Natalie Addison
Transport Strategy Officer
Transport for Greater Manchester

<https://beenetwork.com>

TfGM supports working flexibly. If I contact you outside your usual working hours then please reply when it's convenient for you.

From: [REDACTED] > On Behalf Of Strategic Planning
Sent: 15 April 2025 11:37
To: Strategic Planning <strategic.planning@trafford.gov.uk>
Subject: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

Dear Sir/ Madam,

RE: Draft Warburton Neighbourhood Development Plan 2025-2039 – Regulation 16 Consultation

Warburton Parish Council submitted their draft Neighbourhood Development Plan on 28th February 2025. Trafford Council is now administrating the (Regulation 16) Consultation on the draft Warburton Neighbourhood Development Plan, which will run from 15 April 2025 until 3 June 2025, 23:59.

Where to view the consultation documents

The draft Warburton Neighbourhood Development Plan and associated documents are available to view on the Strategic Planning web pages at: [Warburton Neighbourhood Plan](#)

The documents are also available to view on screens in all Trafford libraries during normal opening hours and a hard copy is available at Partington Library or on request (please contact Strategic Planning). For more information about locations and opening hours go to: <http://www.trafford.gov.uk/libraries>.

How to comment

Comments are invited on the draft Warburton Neighbourhood Development Plan until 3 June 2025, 23:59.

Comments on the plan should be made using the comment form (editable PDF) available on Trafford Council's website (above) and emailed to strategic.planning@trafford.gov.uk. Alternatively, comments can be posted to: Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford. M32 0TH.

Please consider and refer to the [Basic Conditions](#), as appropriate, in your representation.

Please be aware that all representations made through the Regulation 16 Consultation will be publicly available (including the Council's website) and may also appear on the Warburton Parish Council websites.

Should you require further information, then please contact the Strategic Planning team on the contact details above.

Next steps

Following the conclusion of the consultation, the responses received will be collated and sent to the independent examiner who will consider the comments in preparing an examiner's report.

Upon publication of the examiner's report Trafford Council are then required to make a decision on the plan proposal and issue a decision statement. The Warburton Neighbourhood Development Plan, if 'made', will form part of the Development Plan for Trafford Council and thus would be used by the Council to help it decide planning applications within the neighbourhood area.

If you no longer wish to be contacted about Trafford's planning policy documents – including the Local Plan, please email strategic.planning@trafford.gov.uk or contact us by telephone on 0161 912 3149.

Yours sincerely

The Strategic Planning and Growth Team

Strategic Growth Services

Growth, Communities & Housing Service

Trafford Council | Trafford Town Hall, Talbot Road, Manchester M32 0TH

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United Utilities Water Limited

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

unitedutilities.com

[REDACTED]

By email only: strategic.planning@trafford.gov.uk

Your ref:
Our ref:
Date: 03-JUN-25

Dear Sir / Madam

WARBURTON PARISH COUNCIL – DRAFT WARBURTON NEIGHBOURHOOD PLAN 2024-2039

Thank you for your consultation seeking the views of United Utilities Water Limited (UUV) as part of the preparation of the Warburton Neighbourhood Plan 2024-2039 (NP). UUV wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.

Allocations for New Development

Following our review of the NP, we note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for Trafford Metropolitan Borough. If this were to change, we would request early dialogue so that we can inform the site selection process and ensure any issues that are a concern to us are highlighted to you as early as possible.

Our Assets

It is important to outline the need for our assets to be fully considered in any proposals in the NP Area.

UUV will not allow building over or in close proximity to a water main.

UUV will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.

Site promoters should not assume that our assets can be diverted.

On occasion, an asset protection matter within a site can preclude delivery of a proposed development. It is critical that site promoters / applicants engage with UUV on the detail of their design and the proposed construction works.

All U UW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels. The details for any accesses that are proposed to cross our assets (temporary or permanent) and any services that are located within the easement / offset area for our assets must also be agreed in writing.

We strongly recommend that the LPA advises future applicants / promoters of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. We ask site promoters to contact U UW to understand any implications using the below details:

Developer Services – Wastewater



Developer Services – Water



Draft Policy W3 Protecting and Enhancing Wildlife

We note criteria 6 of this draft policy. Strictly following the hierarchy for managing surface water helps to reduce the volume of surface water that discharges to the public combined sewer, which in turn, helps to manage the risk of combined sewers overflowing into the region’s watercourses. Such overflows can have consequential environmental impacts on receiving habitats. Importantly, a wastewater company has no right to refuse a connection of surface water to the public combined sewer under the Water Industry Act 1991 (as amended) or insist on the implementation of sustainable drainage systems. This power rests with the planning system. In this context, we request the following additional text to criterion 6:

‘Surface water must be discharged in accordance with the surface water hierarchy in national planning practice guidance. Applications will be required to incorporate sustainable drainage, which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless there is clear evidence why such techniques are not possible. The sustainable drainage must be integrated with the whole of the landscaped environment and the strategy for biodiversity net gain. In accordance with the principles in the Ciria SuDS Manual, any surface water discharge must include a treatment train that demonstrates no unacceptable impact on the habitat of the receiving body.’

Previous Policy relating to Warburton Masterplan

U UW notes this policy is now deleted. It cross referenced the Design Guidance of the Warburton NDP Masterplan and Design Guide. We have provided more detailed comment on this design guidance below.

In our previous submission we referred to Map 8: Warburton NDP Masterplan. U UW queried whether this masterplan has been fully informed by a hydrological and hydrogeological assessment of the site which considers site topography, naturally occurring flow paths, ephemeral watercourses and any low-lying areas where water natural accumulates. The resultant masterplan must take account of

such circumstances and any exceedance / overland flow paths from existing and proposed drainage features. It is not clear whether the masterplan has been fully informed by such background evidence.

In the context of this masterplan, we wish to highlight the importance of complying with development plan policy in Places for Everyone. In particular, the following criteria from Policy JP Allocation 30: New Carrington:

‘24. Undertake hydrological and ground investigations as necessary to inform the comprehensive masterplan and use of suitable construction techniques to ensure any loss or deterioration of irreplaceable habitat, and adverse impacts on the hydrology of undeveloped areas, is minimised. Where loss or deterioration is unavoidable, a suitable compensation strategy should be identified and delivered, including the potential restoration of lowland raised bog and complementary habitats elsewhere within the site;

26. Deliver a clear and measurable net gain in biodiversity, including provision for long-term management of habitats and geological features which may include SuDS systems of high biodiversity value created as part of the overall flood risk and drainage strategy;

34. Mitigate flood risk and surface water management issues, both within and beyond the site, through the design and layout of development and in accordance with an allocation wide flood risk, foul and surface water management strategy, which will form part of the Masterplan/delivery strategy (Criterion 1);

36. Incorporate appropriate noise and air quality mitigation particularly along major transport corridors and in relation to existing and new businesses, facilities and employment uses, including existing operational wastewater treatment works;’

In the context of these criteria, we wish to emphasise the importance of:

- a hydrological assessment to inform the development of the site;
- the need for SuDS systems of high biodiversity value created as part of the overall flood risk and drainage strategy;
- the need for an allocation wide foul and surface water management strategy to inform the approved masterplan; and
- the need to incorporate any necessary noise and air quality mitigation in relation to the existing operational wastewater treatment works. This would include the operational wastewater treatment works at Partington, which sits to the north of the Warburton Masterplan.

Any masterplan and associated design guidance that is approved by the local planning authority must fully reflect these criteria. We request that these matters are explicitly addressed in the design guidance and any associated document. We also wish to note that it may be necessary for any masterplan to be informed by appropriate assessments relating to odour and noise given the proximity of the allocation boundary to Partington Wastewater Treatment Works.

Draft Policy W10 Sustainable Design and Climate Change

This policy refers to the following parts of the Masterplan and Design Guide:

- Part 3.5 Water and Flood Risk; and
- Part 4.3.3 Sustainability and Climate Change.

Our comments on these parts are set out below.

Part 3.5 Water and Flood Risk

For consistency with national policy, we request that the Design Principles in this part are amended to state:

'No ~~Avoid siting~~ homes in high risk flood areas (having regard to all sources of flood risk) and mitigate increased risk of storms/flooding with high quality multi-functional sustainable drainage systems (see part 5.3.3 for more detail on SuDS requirements). These reduce the amount and rate at which surface water reaches sewers/watercourses.'

Part 4.3.3 Sustainability and Climate Change

Sustainable Drainage

The 3rd paragraph of Part 4.3.3 states:

'All proposals must demonstrate sustainable surface drainage systems that will not unduly increase pressure on existing wastewater and natural drainage systems.'

To more effectively outline the policy and design requirements for sustainable drainage within the Warburton Lane element of the Carrington allocation, we request that this paragraph is supplemented with the following text:

'Proposals for development at the Warburton Lane element of the Carrington allocation must be consistent with the allocation wide strategy for foul and surface water management required by Places for Everyone, informed by a hydrological assessment and an assessment of flood risk from all sources. Surface water must be discharged in accordance with the surface water hierarchy in national planning practice guidance. The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted. The whole development must make space for sustainable drainage that is multi-functional and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). The sustainable drainage must be integrated with the whole of the landscaped environment and the strategy for biodiversity net gain. SuDS features shall include permeable surfacing, soakaways, filter drainage, swales, bioretention tree pits, rain gardens, basins, ponds, reedbeds, wetlands, etc. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.'

It is important that the NP and associated design guidance includes clarity in relation to the requirement for sustainable drainage systems at the Warburton Lane element of the Carrington allocation. This clarity is critical to avoid regulatory / policy uncertainty and ensure a level playing to housebuilders operating in a competitive setting when acquiring a site (see *Sustainable drainage and new housing developments, Payne, Walker, Illman and Sharp, 2023*). We strongly recommend that policy and the design guidance clearly identify the need for the proposed development to make space for multi-functional sustainable drainage systems as part of a wider masterplan. As evidenced in the aforementioned research, clarity of policy requirements will help to secure better sustainable drainage results in the final design of the development.

Water Efficiency

We also note the following paragraph relating to water efficiency:

'The installation of water butts within new residential developments is encouraged to collect rainwater from roofs and reduce the overall rainwater run off impact of any development.'

Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/d) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. We have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We therefore recommend the inclusion of the following additional wording as a new policy in the emerging NP and cross referenced in the associated design guidance regarding water efficiency.

'All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.'

We also suggest that any non-residential development should also be the subject of water efficiency requirements as per the below recommended wording:

'All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard.'

We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reduction noting that water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills.

If you have any queries or would like to discuss this representation, please do not hesitate to contact me at [REDACTED]

Yours faithfully

Andrew Leyssens
Planning, Landscape and Ecology
United Utilities Water Limited

Enc. *Water Resources West Evidence*

WATER EFFICIENCY IN NEW HOMES

Evidence to support adoption of the Building Regulations Optional Requirement for local authorities in North West England and the Midlands

Background

Water is essential for life - yet here in the UK (as in many regions across the world) the future availability of water is a concern. The area covered by Water Resources West is an area the Environment Agency has described as having ‘moderate water stress’; water scarcity/stress occurs when demand is high compared to the water that is available¹.

Population growth, climate change and environmental protection measures all put pressure on water resources and contribute to water stress in our region. On top of this, housing shortages mean that lots more housing is needed today and in the future. Hence, planning policy is a vital tool to help ensure long term sustainable management of water supplies, as well as helping protect our local rivers and wildlife. Achieving a balance between these conflicting demands is a challenge for us all.

Water Efficiency Standards for New Homes

The Code for Sustainable Homes was launched in 2006 to help reduce UK carbon emissions and create more sustainable homes; it was the national standard for use in the design and construction of new homes in the UK and is still referred to in older Local Plans. In 2015 it was withdrawn and some of its standards were consolidated into Building Regulations including the requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In the same year, the Government updated Building Regulations Part G, introducing an ‘optional’ requirement of 110 l/p/day for new residential development, which should be implemented through local policy where there is a clear need based on evidence. (See [Appendix 1](#)).

In 2018, Welsh Government amended building regulations so that new builds are built to a standard of 110 l/p/d². In England however the standard of 110 l/p/d needs to be adopted as a local policy by each planning authority in its local plan before it can take effect.

In 2020, the government published a White Paper on future planning³ in England. The focus is on clear requirements and standard approaches. It clear that water will remain an important consideration and that “sustainable development” will be a key test.

The Need for Water Efficiency in New Homes

The Water Framework Directive (WFD) was adopted into UK Law in 2003. It was designed to change water management for the better by putting aquatic ecology at the heart of all management decisions. One of the most important features of the WFD is that it encourages public consultation, meaning everyone can have a say in what is needed to protect our water resources. It also takes into account the environmental, economic and social implications of any such investment/decisions.

Delivery of the WFD objectives in our region is set out in River Basin Management Plans for the Solway Tweed, North West, Dee, Severn and Humber River Basins. These documents highlight a number of issues that are affecting the achievement of the WFD objectives, one of these is the pressures from water supply. Thus, there are a variety of reasons why water efficiency is important for Local Authorities.

¹ [Water stressed areas – final classification](#), Environment Agency and Natural Resources Wales, July 2013

² [The Building \(Amendment\) \(Wales\) Regulations 2018](#)

³ [Planning for the future](#), Ministry of Housing, Communities and Local Government, August 2020

Local Authorities have a duty of care for communities and the environment and the reduction in water use can help to minimise the quantity of water taken from the environment as well as helping to control customer bills. There are some important factors to consider in this regard:

- The general Duty to Co-operate⁴ can also apply to water efficiency and, across the region, there are several examples of exemplar project partnerships between Local Authorities and water companies.
- The National Planning Policy Framework⁵ Section 2 requires strategic policies to make sufficient provision for water supplies. Section 14 of the NPPF concerns “Meeting the challenge of climate change, flooding and coastal change” and paragraph 149 make specific reference to water supply within this context. Paragraph 170 goes on to set out that planning policies and decisions should contribute to and enhance the natural and local environment including water. For reference we have included specific government guidance in relation to the optional standard in [Appendix 2](#).
- Local Authorities must “have regard to the River Basin Management Plans and any supplementary plans in exercising their functions” and this includes taking action on water efficiency.
- The production of mains water requires significant energy and chemical inputs and hence reducing demand for water can contribute significantly to reducing carbon emissions, especially where those savings are of hot water.

Why do we need to save water?

The areas covered by Water Resources West are classed as an area under ‘water stress’ by the Environment Agency (Table 1). While local planning authorities are encouraged to draw on this existing evidence to establish the need for possible action government makes clear that this should not be the only consideration⁶ – not least because current maps were not developed to establish areas where additional controls were required on new homes. A requirement for a higher water efficiency standard within a local plan should also follow on from consultation with the local water supplier and the Environment Agency. Additional reasons for the local need for action highlighted by the Environment Agency and the local water suppliers are set out below.

Table 1. Water Stress Classification for current and future scenarios¹ (L=low stress; M=moderate stress; S=serious stress). The four scenarios represent the range of pressures on water resources from climate change and future demands.

Water company area	Current Stress	Future Scenario 1	Future Scenario 2	Future Scenario 3	Future Scenario 4
Dwr Cymru Welsh Water	M	M	M	M	M
Severn Trent	M	M	M	M	M
South Staffs Water	M	M	M	M	M
United Utilities	M	M	M	M	M

⁴ [Section 110 of the Localism Act](#) sets out the ‘Duty to Co-operate’. It requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. Even if the formal duty is removed in future legislation, the August 2020 White Paper³ makes it clear that strategic, cross-boundary issues should still be considered in the context of sustainable development.

⁵ [National Planning Policy Framework](#), Ministry of Housing, Communities & Local Government, February 2019

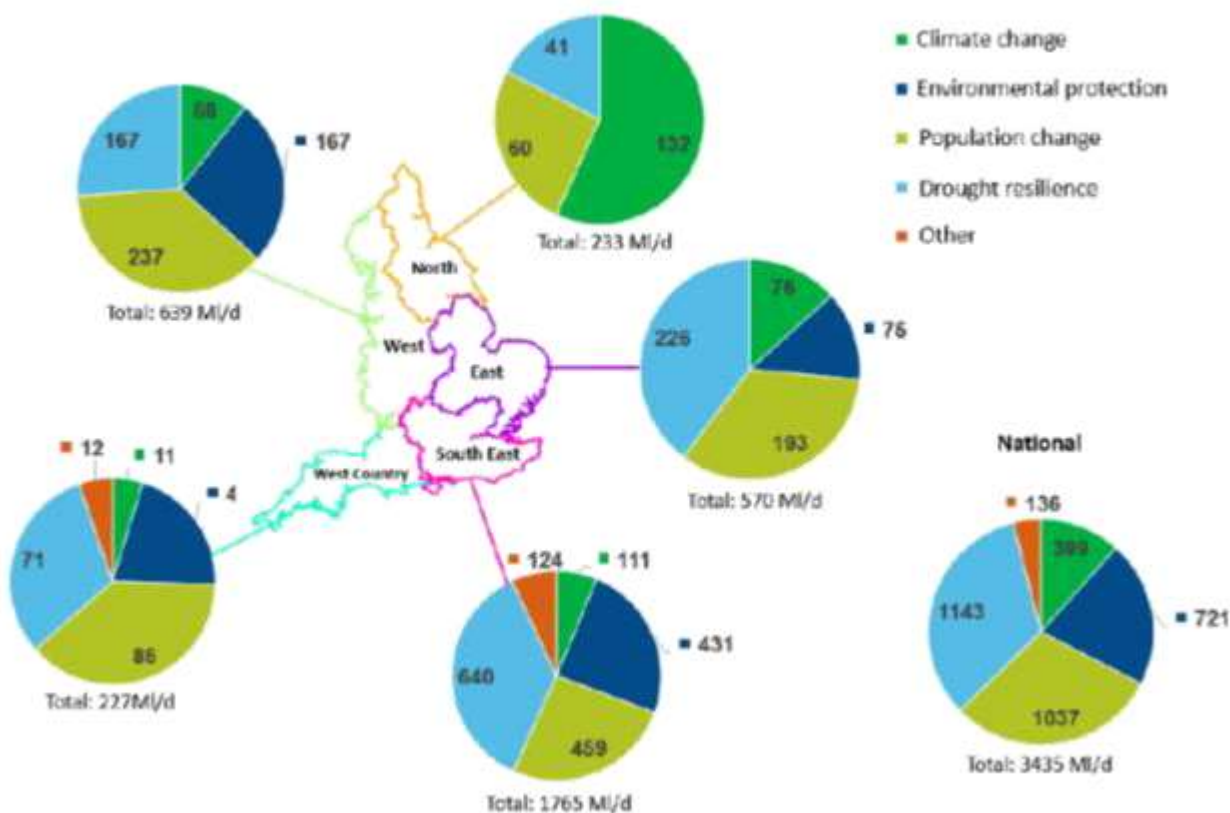
⁶ [Housing Standards Review Consultation](#), Department for Communities and Local Government, August 2013

In March 2020, the Environment Agency published the National Framework for Water Resources⁷. This identifies strategic water needs for England and its regions across all sectors up to and beyond 2050. The National Framework identifies that our region faces the second highest pressures on Water Resources. Significantly, the National Framework identifies that increased consumption, driven by population increases, is the largest driver of additional water need in the region. Increased public water supply drought resilience, increased protection for the environment and the impact of climate change reducing water availability of existing supplies also have impacts on water availability (Figure 1).

Based on the best available evidence the National Framework adopted a planning assumption of reducing average per capita consumption (PCC) to 110 l/p/d by 2050 nationally. Water Resources West’s projections are broadly consistent with that, with average per capita consumption reducing to 111 l/p/d by 2050⁸. These projections are based on forecasts made for the water companies’ 2019 WRMPs.

Even with these reductions in consumption, parts of our region will need new water resources to be developed⁸. If the planned reductions are not achieved then more significant and more costly water resources will need to be developed. It is therefore important the measures are taken across the region to support the achievement of the lower per capita consumption.

Figure 1. Extract from the National Framework⁷ showing how population growth results in Water Resources West having the second highest pressure on water resources in England. Numbers in the pie charts show the additional water needed by 2050 due to different drivers (in MI/d).



⁷ [Meeting our future water needs: a national framework for water resources](#), Environment Agency, March 2020

⁸ [Initial Resource Position](#), Water Resources West, March 2020

Public concern also highlights the need to support water saving. Surveys⁹ of water users in North West England and the Midlands have shown that, while there is little general awareness of the issues, once informed 70% are concerned about water scarcity. In addition to running out of water, customers are worried about the potential impact on water bills, restrictions and wastage

Water Framework Directive requirements are set out in River Basin Management Plans. Water efficiency measures have a direct effect in reducing the abstraction from water bodies assessed in those plans. Abstraction in turn affects the hydrological regime of those water bodies. River Basin Management Plans for the Solway Tweed, North West, Dee, Severn and Humber River Basins identify that there are waterbodies within all those areas for which the hydrological regime does not support good status. In turn the hydrological regime can affect water quality, species and habitats.

Changes to the natural flow and level of water is identified as a significant water management issue. Reduced flow and water levels in rivers and groundwater caused by human activity (such as abstraction) can mean that there is not enough water for people to use and wildlife might not be able to survive. Reduced flow affects the health of fish and exaggerates the impacts of barriers such as weirs.

Table 2. WFD classification of waterbodies in 2015 River Basin Management Plans

River Basin District	Percentage of surface water bodies not achieving good ecological status or potential	Percentage of groundwater bodies not achieved good quantitative status
Solway Tweed ¹⁰	54% (305 out of 560)	28% (18 out of 64)
North West ¹¹	78% (480 out of 613)	11% (2 out of 18)
Humber ¹²	86% (839 out of 987)	25% (13 out of 51)
Severn ¹³	80% (604 out of 755)	21% (9 out of 42)
Dee ¹⁴	73% (68 out of 93)	0% (0 out of 5)

Summary of evidence on the need for the optional water efficiency standard

As we have seen above, there is a range of evidence on the water stress across the North West and the Midlands. This means there is a clear need for the 110 l/p/d water efficiency standard.

For inclusion in a local plan a local planning authority must be able to demonstrate at examination of the plan that the standard is required to address a clear need and as part of an approach to water efficiency that is consistent with a wider approach to water efficiency as set out in the local water undertaker's water resources management plan. We recommend that the following evidence is cited:

- The classification of moderate water stress for the water supplier in your area (Table 1)¹.
- The National Framework for water resources noting that Water Resources West faces the second highest pressures on water resources in England due largely to population growth⁷.
- The National Framework for water resources planning assumption of 110 l/p/d⁷.
- The consistency between these planned reductions in consumption between the National Framework, Water Resources West's plans and your water supplier's WRMP⁸.

⁹ [Customer Survey for Severn Trent, Thames Water and United Utilities](#), Verve, July 2018

¹⁰ [River basin management plan for the Solway Tweed river basin district: 2015 update](#), Environment Agency and Natural Scotland, 21 December 2015

¹¹ [River basin management plan, Part 1: North West river basin district](#), Environment Agency, December 2015

¹² [River basin management plan, Part 1: Humber river basin district](#), Environment Agency, December 2015

¹³ [River basin management plan, Part 1: Severn river basin district](#), Environment Agency, December

¹⁴ [Dee River Basin Management Plan 2015 – 2021, Proposed Summary](#), Natural Resources Wales and Environment Agency, October 2015

- High levels of public concern (70%) in the region, when informed about issues of water scarcity⁹.
- Reference to the WFD ecological status of water bodies in your River Basin District, with changes to flow and level recognised as a significant water management issue in the River Basin Management Plan (Table 2).

Water Companies

A consequence of the population and housing growth in our region has meant that water companies have been asked to accommodate the new growth, yet at the same time their abstraction licenses are being reduced. Therefore it is vital that water companies support and are supported in initiatives to help get 110 l/p/d in planning policies across local authorities in the region, to help meet their requirement to supply their customers. The water companies in Water Resources West are Dwr Cymru Welsh Water, Severn Trent, South Staffs and United Utilities.

In preparing your local plan you should consult with your local water supply company on specific local issues.

New Homes

The scale of new development that is needed across our region is immense - the Government aiming for delivery of 300,000 new homes a year across England¹⁵. Within Water Resources West's region we estimate that there will be 1.6 million new properties by 2050. Yet at the same time there is need to share the already scarce water resources - therefore the need for implementing at least 110 l/p/d into local plans and policies is apparent.

Impact on viability

The cost of installing water-efficient fittings to target a per capita consumption of 110l/d has been estimated as a one-off cost of £9 for a four bedroom house¹⁶. Research undertaken for the Welsh Government indicated potential annual savings on water and energy bills for householders of £24 per year as a result of such water efficiency measures¹⁷.

The Consumer Council for Water notes that the discretionary, tighter (building) standard of 110 l/p/d is something that should be pursued, also bearing in mind that saving water is not the only a driver of water efficiency¹⁸. This is because water efficiency could also have a positive effect on reducing energy bills, water bills of metered customers and carbon emissions.

The Greater London Authority carried out a survey of developers to test the viability of the 110 l/p/d standard. The results of this survey¹⁹ made it clear that those associated with the development industry did not consider that the proposed changes would have any impact on building.

Viability is also evidenced by the examples from other local authorities who have adopted the standard. South Worcestershire adopted the 110 l/p/d standard in its February 2016 local plan. The standard remains the preferred option for next local plan. See the case study below. Bromsgrove and Redditch councils cooperated to require the 110 l/p/d standard for certain developments in their plans which were adopted in January 2017. Another example is Nottingham City Council who adopted the 110 l/p/d standard for all new dwellings in January 2020.

¹⁵ [Planning for the Future](#), Ministry of Housing, Communities and Local Government, March 2020

¹⁶ [Housing Standards Review Cost Impacts](#), Department for Communities and Local Government, September 2014

¹⁷ [Advice on water efficient new homes for England](#), Waterwise, September 2018

¹⁸ [Response to Defra consultation on measures to reduce personal water use](#), Consumer Council for Water, October 2019

¹⁹ [Greater London Authority Housing Standards Review: Evidence Of Need](#), David Lock Associates, May 2015

Water efficiency is therefore not only viable but of positive economic benefit to both private homeowners and tenants.

Water Calculator

The Water Calculator was developed to help provide a working example of the calculator used for part G of the building regulations. It uses the method set out in the ‘Water Efficiency Calculator for New Dwellings’²⁰. The Water Calculator contains information on water consumption for hundreds of products, enabling quick and easy specification, without the hassle of gathering data from several product manufacturers. To access the water calculator visit: www.thewatercalculator.org.uk

Case study

South Worcestershire’s current local plan was adopted, following examination, in February 2016²¹. It is a major sub-regional land use plan, prepared jointly by the three South Worcestershire Councils; Malvern Hills, Worcester City and Wychavon working together. Within the local plan, policy SWDP30c states that “for housing proposals, it must be demonstrated that the daily non-recycled water use per person will not exceed 110 l/p/d”. The reasoned justification for this policy highlights the following factors:

- This policy is central to the council’s response to the Framework, which advocates that local plans incorporate strategies to mitigate and adapt to climate change, in line with the objectives and provisions of the Climate Change Act 2008 over the longer term. This includes factors such as flood risk, water supply and changes to biodiversity.
- Without effective local planning and risk management, the consequences of climate change may also have a significant detrimental impact on budgets and service delivery. It may also compromise the Government’s ability to meet the statutory requirements under the Climate Change Act 2008.
- Local planning authorities have a general responsibility not to compromise the achievement of United Kingdom compliance with the Water Framework Directive (WFD(68)) (Directive 2000/60/EC). More specifically, the local plan has to take into account the River Severn Basin Management Plan, which in itself is a requirement of the WFD. All surface water bodies need to achieve “good ecological status” by 2015.
- The Localism Act 2011 enables the UK government to require local authorities to pay if their inaction results in a failure to meet WFD requirements.
- The Localism Act 2011 also requires local planning authorities to co-operate on strategic cross-boundary matters, for example the provision of water supply infrastructure, water quality, water supply and enhancement of the natural environment. Consequently, there is a need for developers to engage positively with the local water supplier to ensure that all the necessary infrastructure is secured, so as to ensure that there is no deterioration in the quality or quantity of water of the receiving water body(ies) and to avoid delays in the delivery of development.
- The 2006 Natural Environment and Rural Communities (NERC) Act imposes a duty on local planning authorities to have regard to conserving biodiversity in carrying out all of their functions.
- The South Worcestershire Water Cycle Study looks at the level of planned growth and the ability of the infrastructure (i.e. water supply and waste water treatment) to accommodate it without adversely affecting the natural water cycle. It identifies an overall shortage in future water supplies that necessitates the delivery of minimum water efficiency targets.
- The effective management of water is considered critical in the pursuit of sustainable development and communities. It reduces the impact flooding can have on the community, maintains water quality and quantity and helps to enhance local amenity / property value and biodiversity through the provision of Green Infrastructure. Effective water management also reduces the movement of water and sewage, thereby reducing energy requirements. Development proposals incorporating grey

²⁰ Appendix A of [Approved Document G, The Building Regulations 2010](#), HM Government 2015 edition with 2016 amendments

²¹ [South Worcestershire Development Plan, Adopted](#), February 2016.

water recycling will therefore be supported and opportunities for the retrofitting of water efficiency measures will be encouraged.

The South Worcestershire Councils are currently preparing the next local plan. Following consultation its Preferred Options report²² was published in November 2019. In relation to water efficiency the preferred option is to require new dwellings to meet the tighter Building Regulations optional requirement of 110 l/p/d as per the adopted policy.

Recommendations

There is firm evidence in across the North West and the Midlands that clearly justifies the need for more stringent water efficiency targets for new residential development. Local Authorities should consider all the factors in their local plans and we strongly recommend they adopt 110 l/p/d for water efficiency using the suggested wording below:

All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.

Past experience has shown that successful adoption of 110l/p/d in local plans requires the following:

1. Significant engagement and consultation is required in developing local plans, including engagement with key stakeholders and public sector partners, responsible for delivering a range of services and infrastructure.
2. Recommend local plans are subject to public consultations (many people are concerned about water) and that where appropriate, comments from the public help shape the contents of this plan and helps with public buy-in.
3. Local plans should actively encourage the design of new buildings that minimise the need for energy and water consumption, use renewable energy sources, provide for sustainable drainage, support water re-use and incorporate facilities to recycling of waste and resources.
4. Local plans should have a positive approach to the adaptation of climate change –
 - by avoiding development in areas at greatest risk of flooding, and
 - promoting sustainable drainage, and
 - challenging water efficiency standards.

²²[South Worcestershire Development Plan Review, Preferred Options Consultation](#), November 2019.

Appendix 1. Extract from Part G of the Building Regulations

Extract from Part G of Building Regulations

Optional requirement

2.8 The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.

2.9 The person carrying out the work must inform the **BCB** where the optional requirement applies.

2.10 As an alternative to calculating the water consumption (as paragraph 2.8), a fittings approach that is based on the water efficiency calculator methodology may be used.

2.11 Where the fittings approach is used, the water consumption of the fittings provided must not exceed the values in Table 2.2. If they do, the water efficiency calculator must be completed to demonstrate compliance. Similarly, where a shower is not to be provided or where a waste disposal unit, a water softener or water re-use is to be provided the water efficiency calculator must be completed.

2.12 Where the fittings approach is used, the notice given under regulation 37 should state "Less than 110 litres/person/day using fittings approach".

Table 2.2 Maximum fittings consumption optional requirement level

Water fitting	Maximum consumption
WC	4/2.6 litres dual flush
Shower	8 l/min
Bath	170 litres
Basin taps	5 l/min
Sink taps	5 l/min
Dishwasher	1.25 l/place setting
Washing machine	8.17 l/kilogram



Appendix 2 NPPF Planning Practice Guidance Housing: optional technical standards, Water efficiency standards²³

Can local planning authorities require a tighter water efficiency standard in new dwellings?

In setting out how the planning system should contribute to the achievement of sustainable development, the National Planning Policy Framework and guidance makes clear this includes planning to provide the high quality housing required to meet the needs of present and future generations, and helping to use natural resources prudently. The Framework's policies expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Early engagement between local planning authorities and water companies can help ensure the necessary water infrastructure is put in place to support new development. See [water supply guidance](#). The local planning authority may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.

Paragraph: 013 Reference ID: 56-013-20150327

Revision date: 27 03 2015

What standard should be applied to new homes?

All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out [Local Plan](#) policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

Paragraph: 014 Reference ID: 56-014-20150327

Revision date: 27 03 2015

How should local planning authorities establish a clear need?

It will be for a local planning authority to establish a clear need based on:

- existing sources of evidence.
- consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See [paragraph 003 of the water supply guidance](#)
- consideration of the impact on viability and housing supply of such a requirement.

Paragraph: 015 Reference ID: 56-015-20150327

Revision date: 27 03 2015

What are the existing sources of evidence?

Primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:

- The Environment Agency [Water Stressed Areas Classification \(2013\)](#) which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.
- Water resource management plans produced by water companies.
- [River Basin Management Plans](#) which describe the river basin district and the pressure that the water environment faces. These include information on where water resources are contributing to a water body

²³ <https://www.gov.uk/guidance/housing-optional-technical-standards#water-efficiency-standards>

being classified as ‘at risk’ or ‘probably at risk’ of failing to achieve good ecological status, due to low flows or reduced water availability.

In addition to these primary data sources, locally specific evidence may also be available, for example collaborative ‘water cycle studies’ may have been carried out in areas of high growth.

Paragraph: 016 Reference ID: 56-016-20150327

Revision date: 27 03 2015

Where can I find out more about the water efficiency standard?

See further information on the [water efficiency standard](#).

Paragraph: 017 Reference ID: 56-017-20150327

Revision date: 27 03 2015



Draft Warburton Neighbourhood Development Plan 2025 – 2039

Regulation 16 Consultation Response Form

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Question 1

Do you support, oppose or have general comments about the plan?

Support

Object

General Comment

Please provide your comments below - continue on to a separate sheet if required. If you are objecting, please set out what changes you consider are necessary to ensure the plan meets the [Basic Conditions](#).

Question 2

Would you like to be notified of Trafford Council's decision to 'make' the Warburton Neighbourhood Development Plan?

Yes No

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Contact Details

Name: Adrian Smith

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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Support Object General Comment

Please provide your comments below - continue on to a separate sheet if required. If you are objecting, please set out what changes you consider are necessary to ensure the plan meets the [Basic Conditions](#).

Having witnessed how the development of [redacted] former farmstead land into the current [redacted] (gated community) has adversely affected [redacted] heritage property, I fully recognise the need for the NDP.

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Strategic Planning, Trafford Council, Trafford Town Hall, Talbot Road, Stretford, M32 0TH

Contact Details

Name: Anthony Pearson

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

Question 1

Do you support, oppose or have general comments about the plan?

Support

Object

General Comment

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Draft Warburton Neighbourhood Development Plan 2025 – 2039

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Contact Details

Name: Birgit Walker

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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Contact Details

Name: Carole Cormack

Organisation (if applicable):

Address
Postcode
Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address
Postcode
Email:

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Support Object General Comment

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Contact Details

Name: Catherine Pearson

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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Fully agree

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Contact Details

Name: Christine Haves

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

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Contact Details

Name: Clare Grace

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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Fully support the Warburtonb neighborhood plan.

Question 2

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Our village needs to be protected from inappropriate development and ensure it retains its character.

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Contact Details

Name: Elsa Beckmann

Organisation (if applicable):

Address:

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Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

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Strongly support and agree!

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Contact Details

Name: Heath Fogarty

Organisation (if applicable):

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Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

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Contact Details

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Contact Details

Name: Julie Winstanley

Organisation (if applicable):

Address:

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Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable):

Address:

Postcode:

Email:

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Contact Details

Name: Juliet Lewis

Organisation (if applicable):

Address: [Redacted]

Postcode: [Redacted]

Email: [Redacted]

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address: [Redacted]

Postcode: [Redacted]

Email: [Redacted]

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Contact Details

Name: Jyoti Raja

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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"Dear Sir/Madam,

I am writing to register my formal objection to any development in the Warburton area. While I recognise the general need for housing, this particular proposal raises serious concerns across a range of planning and environmental factors. Based on comparable situations in similar rural villages, it is evident that unchecked development of this nature can have lasting negative consequences. There are plenty of brown field sites to build on including Partington .

1. Excessive Housing Density

The proposed density does not reflect the established character of Warburton. Similar developments in villages such as Wybunbury in Cheshire and Burton Green in Warwickshire have demonstrated how high-density builds in rural settings often result in a loss of local identity, overwhelming smaller communities and undermining the traditional rural fabric.

2. Disruption During Construction

Lengthy construction periods, as witnessed in Little Budworth (Cheshire), have led to months — even years — of noise, dust, and general disruption to village life. There is no indication that this development will be any different, particularly given the scale.

3. Access for Heavy Machinery

Warburton's narrow roads are ill-equipped to handle construction vehicles. A similar issue was encountered during the early phases of development in the village of Barford (Warwickshire), where damage to historic lanes and safety risks became significant concerns for both residents and local authorities.

4. Access for Future Residential Traffic

Once complete, the development will lead to a large increase in residential traffic. We've seen in Mobberley, Cheshire, how new housing schemes can double or even triple traffic levels, overwhelming infrastructure not designed for such capacity.

5. Substantial Rise in Local Traffic Volumes

Increased vehicle numbers will not only impact the tranquillity of Warburton but also increase the risk of accidents, particularly on routes without pavements or proper lighting. A similar scenario unfolded in East Hanney (Oxfordshire), where poorly planned access routes led to a marked rise in traffic incidents.

6. Pressure on School Places

Experience from the village of Tattenhall (Cheshire West) shows how new developments can quickly outstrip local school capacity, forcing children to travel outside their catchment areas and placing strain on school transportation systems.

7. Limited Access to Medical and Dental Services

In numerous rural communities, including Overton in Lancashire, residents have reported longer wait times and reduced access to healthcare following large-scale housing developments without prior expansion of medical facilities.

8. Negative Visual Impact

The rural charm of Warburton is one of its defining features. Developments in places like Haddenham (Buckinghamshire) have significantly altered village aesthetics, replacing historic views and open fields with rows of uniform housing that lack visual harmony with their surroundings.

9. Lack of Adequate Screening

This development proposal includes minimal provisions for natural screening or buffers. In Appleton Thorn (Cheshire), failure to include such buffers led to ongoing complaints about privacy and visual intrusion, especially where new builds bordered older properties.

10. Proximity to Listed Buildings

Warburton contains several listed buildings whose settings would be severely compromised by this development. Similar concerns in Bloxham (Oxfordshire) were upheld by planning inspectors who ruled that such proximity was incompatible with heritage preservation goals.

11. Increased Flood Risk to Red Brook

The risk of additional surface runoff affecting Red Brook cannot be ignored. Lessons from Lower Whitley, where new developments exacerbated flash flooding, should inform a cautious approach here — particularly with Warburton's low-lying topography and local watercourses.

12. Inadequate Affordable Housing Provision

The application lacks a clear commitment to delivering truly affordable homes. Developments in Lymm and Great Barrow have faced criticism for failing to meet local needs despite promising inclusive housing strategies.

13. Inadequate Noise Assessment

Villages such as Davenham have raised similar concerns about under-assessed noise impacts during both the construction and residential phases. Without a full and robust environmental noise assessment, the community risks long-term disturbance.

14. Harm to Local Wildlife

The environmental consequences are also of concern. In Tarvin (Cheshire), habitat fragmentation and the decline of species such as bats, owls, and newts followed a poorly mitigated development. Warburton's rich natural environment deserves stronger protections.

Given the overwhelming weight of these issues and the lessons from similar rural communities, I respectfully urge the council to reject further building in a large scale on green belt here. I also request to be kept informed of any developments regarding this application and any associated public consultations.

"

Question 2

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Contact Details

Name: Karen Clegg

Organisation (if applicable):

Address: [Redacted]
Postcode: [Redacted]
Email: [Redacted]

Agent name (if applicable): James Hurrell

Organisation (if applicable):

Address: [Redacted]
Postcode: [Redacted]
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Contact Details

Name: Katherine Beckmann

Organisation (if applicable):

Address: [Redacted]
Postcode: [Redacted]
Email: [Redacted]

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address: [Redacted]
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Address:

Postcode:

Email:

Question 1

Do you support, oppose or have general comments about the plan?

Support

Object

General Comment

Please provide your comments below - continue on to a separate sheet if required. If you are objecting, please set out what changes you consider are necessary to ensure the plan meets the [Basic Conditions](#).

Fully supportive of the NDP and particularly support the content in relation to the proposed developments off Warburton Lane and Moss Lane and their potential impact on Warburton.

Question 2

Would you like to be notified of Trafford Council's decision to 'make' the Warburton Neighbourhood Development Plan?

Yes No

Question 3

Do you wish to be added to the consultation database and kept informed about planning policy matters such as the Local Plan?

Yes No



Draft Warburton Neighbourhood Development Plan 2025 – 2039

Regulation 16 Consultation Response Form

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Contact Details

Name: Lace Reynolds

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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Contact Details

Name: Lucy Houghton

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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Support Object General Comment

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Contact Details

Name: Luke Waldock

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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General Comment

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I moved to Warburton just over two years ago, and in that short time, I've come to truly love the area - its character, its landscape, and its strong sense of community. That's why I'm fully in support of the proposed neighbourhood plan.

From my perspective as a relatively new resident, the plan reflects exactly what makes Warburton so special. It captures the unique qualities of the village and lays out a sensible, community-led approach to how the area can grow without losing what makes it so distinctive. I really appreciate how it promotes sustainable development and considers the longterm needs of both current and future residents.

It's clear that the plan has been shaped through local consultation and a genuine effort to involve the community. I think that's really important - it gives local people a proper say in how Warburton evolves rather than leaving those decisions to outside developers or one-size-fits-all policies.

I also support the emphasis on protecting green spaces, improving infrastructure, and ensuring development is in keeping with the area's rural character. These are things that made me want to live here in the first place, and it's reassuring to see them prioritised.

I believe this plan strikes the right balance between preserving what we value and preparing sensibly for the future. I sincerely hope it's adopted.

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Yes No

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Contact Details

Name: Malcolm Cormack

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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I support the idea that local residents have a say in the future of the village.

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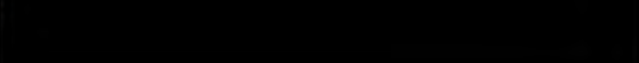
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Contact Details

Name: Paul Davidson

Organisation (if applicable):

Address: [Redacted]
Postcode: [Redacted]
Email: [Redacted]

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address: [Redacted]
Postcode: [Redacted]
Email: [Redacted]

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Contact Details

Name: Peter Smith

Organisation (if applicable):

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Object

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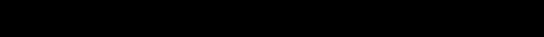
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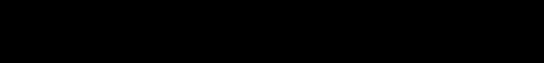
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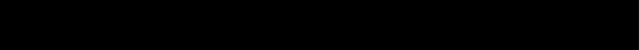
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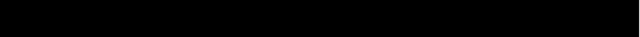
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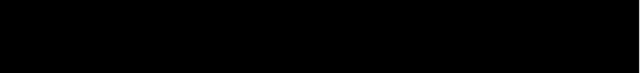
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I fully endorse this very comprehensive plan. It looks to protect and preserve the very distinctive character of this part of rural Trafford., and is not prejudicial against any suitable and sympathetic development.

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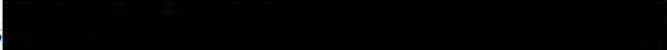
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Contact Details

Name: Sherrie Smith

Organisation (if applicable):

Address:

Postcode:

Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable): Warburton Parish Council

Address:

Postcode:

Email:

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Contact Details

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Organisation (if applicable):

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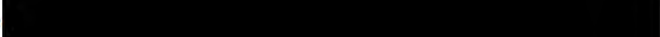
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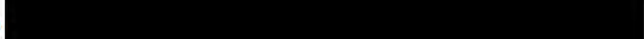
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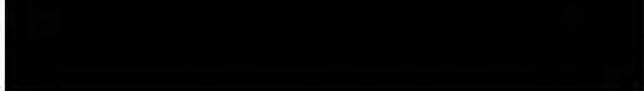
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Do you support, oppose or have general comments about the plan?

Support Object General Comment

Please provide your comments below - continue on to a separate sheet if required. If you are objecting, please set out what changes you consider are necessary to ensure the plan meets the [Basic Conditions](#).

Question 2

Would you like to be notified of Trafford Council's decision to 'make' the Warburton Neighbourhood Development Plan?

Yes No

Question 3

Do you wish to be added to the consultation database and kept informed about planning policy matters such as the Local Plan?

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Draft Warburton Neighbourhood Development Plan 2025 – 2039

Regulation 16 Consultation Response Form

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The submission from Warburton Parish Council includes:

- Final submission letter
- WNP Submission NDP
- Appendix 4: Design Guidance and Codes
- Basic Conditions Statement
- Consultation Statement
- HRA Screening Report Updated Feb 25
- SEA Screening Report Updated Feb 25

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Organisation (if applicable):

Address:

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Agent name (if applicable):

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Contact Details

Name: Wesley Tensel

Organisation (if applicable):

Address:
Postcode:
Email:

Agent name (if applicable): James Hurrell

Organisation (if applicable):
Address:
Postcode:
Email:

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Object

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