

# Strategic Environmental Assessment (SEA) for the Frodsham Neighbourhood Plan

**Environmental Report** 

January 2022

#### Quality information

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## **Table of Contents**

Non	-technical summary	i
1.	Introduction	1
2.	What is the plan seeking to achieve?	2
3.	What is the scope of the SEA?	4
Part	1: What has plan-making/ SEA involved to this point?	5
4.	Introduction (to Part 1)	6
5.	Defining scenarios	7
6.	Scenarios assessment	12
7.	The preferred approach	17
Part	2: What are the SEA findings at this stage?	18
8.	Introduction (to Part 2)	19
9.	Assessment of the FNP	20
10.	Conclusions and recommendations	29
Part	3: What are the next steps?	31
11.	Plan finalisation	32
12.	Monitoring	32
App	endices	33
App	endix I: Meeting the Regulations	34
App	endix II: SEA Scoping Report	38

## **Non-technical summary**

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Frodsham Neighbourhood Plan (FNP) 2021-2030. The FNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the adopted Cheshire west and Chester Local Plan (Parts 1 and 2).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. Central to the SEA process is publication of an Environmental Report alongside the draft plan that presents certain required information. The aim is to inform the consultation and, in turn, plan finalisation.

Preparing the Environmental Report essentially involves answering three questions:

- 1) What has plan-making / SEA involved up to this point?
  - including in relation to 'reasonable alternatives'.
- 2) What are the SEA findings at this stage?
  - i.e. in relation to the draft plan.
- 3) What happens next

#### This Environmental Report NTS

This is the Non-Technical Summary (NTS) of the Environmental Report for the FNP, in which the three questions are answered in turn. Firstly, there is a need to set the scene further by answering: What's the scope of the SEA?

Non-technical Summary

## What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The SEA framework is presented below:

Table A: The SEA Framework

SEA topic	SEA objective
Air quality	Improve air quality within and surrounding the Neighbourhood Plan area and minimise all sources of environmental pollution
Biodiversity	Protect, maintain and enhance biodiversity habitats and species; achieving a net environmental gain and stronger ecological networks.
Climate change	· · · · · · · · · · · · · · · · · · ·
(adaptation)	Frodsham Neighbourhood Plan area to the potential effects of climate change.
Historic environment	Protect, enhance and manage the integrity, distinctive character and setting of heritage assets and the wider historic environment.
Landscape	Protect, enhance and manage the distinctive character and appearance of landscapes.
Population and housing	Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupants throughout their life.
Health and wellbeing	Improve the health and wellbeing of residents within the FNP area.
Transportation	Promote sustainable transport use and reduce the need to travel.

## Plan making/SEA up to this point

An important element of the required SEA process involves assessing **reasonable alternatives** in time to inform development of the draft plan, and then publishing assessment findings in the Environmental Report.

As such, Part 1 of this report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or **housing growth scenarios**.

The process of arriving at housing growth scenarios involved a process of considering the strategic context ('top down' factors), alongside understanding of the sites available and in contention for allocation ('bottom up' factors). The process is set out in Section 5, and summarised in a flow diagram.

Ultimately two housing growth scenarios were identified as reasonable and so warranting formal assessment under the SEA framework – see Table B.

Non-technical Summary ii

Table B: The reasonable housing growth scenarios N.B. figures are for the CWCC Local Plan period (2010-2030)

	Scenario 1	Scenario 2
Supply		
Frodsham residual housing requirement <sup>1</sup>	34	34
Main brownfield site; Land Behind Health Centre	65	65
Remaining sites assessed in the SOA as suitable for allocation plus the Brook works site	32	-
Total new supply to 2030	97	65
Housing competitions and commitments	216	216
Total new supply + completions and commitments	313	281
% difference from CWCC HRF (250)	+25%	+12%

Table C presents the assessment. Presented subsequently is the Frodsham NP Steering Group's response to the assessment, i.e. reasons for supporting the preferred approach, which is **Scenario 1**.

#### Assessment methodology:

Within each row of Table C (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted significant positive (green), minor positive (light green), minor negative (amber), moderate negative (pink) or significant negative (red) effect on the baseline. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Non-technical Summary ii

<sup>&</sup>lt;sup>1</sup> The housing requirement figure of 250 dwellings minus completions and commitments.

Scenario 2 **Topic** Scenario 1 Air Quality 2 2 1 **Biodiversity** Climate change (adaptation) = = Health & Wellbeing 2 1 Historic environment 1 2 Landscape 1 2 Population & housing

Table C: Housing growth scenarios assessment

Key: Within each row, for each of the topics. the columns to the right hand side seek to both **categorise** the performance of each scenario in terms of 'significant effects' on the baseline (using red, amber and light green and dark green)<sup>2</sup> and also **rank** the alternatives in order of performance. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

## **Summary discussion**

Transportation

The assessment shows a mixed picture, with both scenarios associated with pros and cons. Scenario 1 is the best-performing with a significant positive and no major negatives. Scenario 2 also has no significant negatives but performs slightly less well in respect to population and housing. Having said that, it does not automatically follow that Scenario 1 is best-performing overall, as the topics are not assumed to be of equal importance. It is for the decision-maker (also consultees), not this assessment, to assign weight to the various pros and cons and then arrive at a conclusion on which scenario is best-performing overall.

The plan-makers responded to the growth scenarios assessment as follows:

"The preferred approach is to take forward Scenario 1 as the basis for the FNP. This approach is considered to broadly align with the findings of the assessment, which finds Scenario 1 to perform well with respect to the majority of key sustainability issues, both in absolute terms and relative terms."

## Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the FNP as a whole, as it stands at the current time (pre-submission plan).

Assessment findings are presented as a series of narratives under the SEA framework. The assessment reaches the following overall conclusions:

Non-technical Summary iv

<sup>&</sup>lt;sup>2</sup> Red indicates a significant negative effect; amber a negative effect that is of limited or uncertain significance; light green a positive effect that is of limited or uncertain significance; and dark green a significant positive effect. No colour is assigned where effects are considered to be neutral or uncertain.

Overall, the Plan appraisal has served to highlight the potential for both positive and negative effects of varying degrees of significance.

Significant positive effects are anticipated in relation to the population and housing SEA theme as a result of the growth strategy, which will meet and exceed strategic growth targets set in Local Plan (CWCC LPP1); helping to improve choice and potentially affordability in the market. The additional growth also serves to provide a buffer to better secure housing delivery.

Mixed effects are predicted for biodiversity; minor negative effects are highlighted in relation to policy EDVE2 which has the potential to increase recreational pressures on the Frodsham Marshes and the Mersey Estuary biodiversity sites.

These effects would be reduced if the recommendations made in the HRA and SA are taken into account though.

On the other hand, minor positive effects are predicted for biodiversity due to FNP policies seeking to protect and enhance open green spaces which should help reduce habitat fragmentation and provide stepping stones for biodiversity.

Minor negative effects are considered likely for the transportation topic due to the cumulative effects of development on traffic and congestion.

Minor long term positive effects are recognised for climate change adaptation as the Plan allocates development in areas at low risk of flooding and includes policies that seek to protect and enhance open green space.

Minor long term positive effects are predicted with respect to health and wellbeing as the Plan promotes good quality design, a varied mix of housing, encourages active travel and protects green space including recreation and play areas.

Minor positive effects are expected due to the mitigation provided through the FNP Design Code and policy H6. The policies have the potential for positive effects as they help ensure the continued use of heritage assets such as the Grade II listed Brook House.

The Plan is expected to have neutral effects on landscape and air quality as development is allocated in areas of low landscape sensitivity and the scale of growth proposed is not expected to significantly impact air quality including at the AQMA.

## Next steps

This Environmental Report is published alongside the pre-submission version of the FNP. Following consultation, any representations made will be considered by the FNP Steering Group, when finalising the plan for submission.

The 'submission' version of the plan will then be submitted to CWCC (alongside an Environmental Report Update, if necessary). The plan and supporting evidence will be then published for further consultation, and then submitted for examination.

If the outcome of the Independent Examination is favourable, the FNP will then be subject to a referendum, and the plan will be 'made' if more than 50% of those who vote are in support. Once made, the FNP will become part of the Development Plan for Cheshire west and Chester.

Non-technical Summary v

## 1. Introduction

## **Background**

1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Frodsham Neighbourhood Plan ('FNP') 2021–2030.

- 1.2 The FNP is being prepared in the context of the adopted Cheshire West and Chester Local Plan Parts 1 and 2. Once 'made', the FNP will form part of the Cheshire West and Chester Development Plan.
- 1.3 The FNP will be used to guide and shape development within the Plan area.
- 1.4 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising negative effects and maximising positive effects.<sup>3</sup>

## **SEA** explained

- 1.5 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.6 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "identifies, describes and evaluates" the likely significant effects of implementing "the plan, and reasonable alternatives". The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.7 More specifically, the Report must answer the following three questions:
  - 1. What has plan-making / SEA involved up to this point?
    - including in relation to 'reasonable alternatives'.
  - 2. What are the SEA findings at this stage?
    - i.e. in relation to the draft plan.
  - 3. What happens next?

## **This Environmental Report**

- 1.8 This report is the Environmental Report for the FNP. It is published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.9 This report answers questions 1, 2 and 3 in turn, to provide the required information.<sup>5</sup> Each question is answered within a discrete 'part' of the report.
- 1.10 However, before answering Q1, two further introductory sections are presented to further set the scene.

Introduction 1

-

<sup>&</sup>lt;sup>3</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process. The FNP was subject to screening, on the basis of which it was determined that there *is* a requirement for SEA (i.e. the plan was 'screened-in').

<sup>&</sup>lt;sup>4</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>&</sup>lt;sup>5</sup> See **Appendix A** for further explanation of the report structure including its regulatory basis.

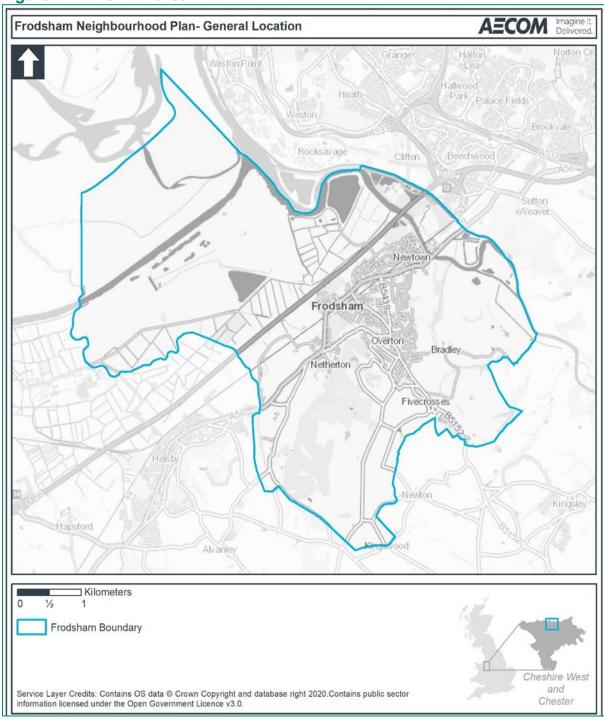
## 2. What is the plan seeking to achieve?

## Introduction

2.1 This section considers the context provided by the applicable Local Plan, which is the adopted Cheshire West and Chester Local Plan Parts 1 and 2 (LPP1 and LPP2), before setting out the established FNP vision and objectives.

2.2 Figure 2.1 shows the plan area.

Figure 2.1: The FNP area



Introduction 2

#### The LPP1/LPP2

The Local Plan identifies Frodsham as a 'Key Service Centre' and allocates growth of 250 dwellings in Frodsham (Policy STRAT8) over the period 2010 to 2030. Policy ECON2 seeks to maintain the important role of Frodsham's centre as a retail and service centre. Policies SOC3 and SOC5 (LPP1) support mixed, balanced, sustainable communities through the provision of market and affordable housing that meets identified future needs.

- 2.4 The LPP1 policy SOC1 seeks affordable housing (AH) provision in rural areas (including Frodsham) on all new residential development (subject to viability) of three or more dwellings or those with a plot area of 0.1 ha and more.
- The FNP is being prepared by Frodsham Neighbourhood Plan Steering Group 2.5 and will cover the period 2021 to 2030.
- 2.6 The following vision has been established for the FNP

"Frodsham will:

Be thriving and sustainable

Value its community and heritage

Encourage innovation, collaboration and social cohesion

Promote access to services"

The FNP also includes the following aims and objectives;

Table 2-1 Aims and objectives of the FNP Aim

Aiiii	Objective
Frodsham will Value its community and heritage	To ensure the built environment fits in with the local character of Frodsham in terms of materials, scale, accessibility and sustainability
To be thriving and sustainable	To provide a mix of dwellings, that meet the needs of Frodsham now and in the future, and address the changing demographics and the towns sustainability
Encourage innovation, collaboration and social cohesion	To encourage the growth of current businesses and support new businesses in Frodsham
Promote access to services	the town and to adjacent areas facilitate easy and safe access for pedestrians and cyclists and are designed for the needs of an ageing population.

**Objective** 

Introduction 3

## 3. What is the scope of the SEA?

## Introduction

3.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability themes and objectives that should be a focus of the SEA. Supplementary information is presented in Appendix B.

#### Consultation

3.2 The SEA Regulations require that "when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England, and Natural England. As such, these authorities were consulted over the period 3<sup>rd</sup> August to 7<sup>th</sup> September 2021, and the responses received are detailed in the Scoping Report (Table AB1 Post Consultation modifications).

## The SEA framework

3.3 Table 3.1 presents a list of topics and objectives that together form the back-bone of the SEA scope. Together they comprise a 'framework' under which to undertake assessment; derived from an understanding of policy context and baseline conditions.

#### **Table 3-1 The SEA framework**

SEA topic	SEA objective
Air quality	Improve air quality within and surrounding the Neighbourhood Plan area and minimise all sources of environmental pollution
Biodiversity	Protect, maintain and enhance biodiversity habitats and species; achieving a net environmental gain and stronger ecological networks.
Climate change (adaptation)	Avoid and manage flood risk and support the resilience of the Frodsham Neighbourhood Plan area to the potential effects of climate change.
Health and wellbeing	Improve the health and wellbeing of residents within the FNP area.
Historic environment	Protect, enhance and manage the integrity, distinctive character and setting of heritage assets and the wider historic environment.
Landscape	Protect, enhance and manage the distinctive character and appearance of landscapes.
Population and housing	Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupants throughout their life.
Transportation	Promote sustainable transport use and reduce the need to travel.

Introduction 4

## Part 1: What has plan-making/ SEA involved to this point?

## 4. Introduction (to Part 1)

## **Overview**

4.1 Work on the FNP has been underway for some while, with several consultation events having been held including a Frodsham wide Consultation in 2014 and Resident's Survey in 2017. The results of the consultations are available on the Frodsham Neighbourhood Plan website.

- 4.2 This is important context; however, the aim here is not to provide a comprehensive explanation of work to date. Rather, the aim is to explain work undertaken to develop and appraise **reasonable alternatives**.
- 4.3 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan, namely the allocation of land for housing, or housing growth scenarios.

## Why focus on housing growth scenarios?

4.4 The decision was taken to develop and assess reasonable alternatives ('scenarios') in relation to the matter of housing growth in light of the Plan objectives (see para 2.7), and because there is the likelihood of being able to differentiate between the merits of alternatives/scenarios in respect of 'significant effects'. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

## Who's responsibility?

- 4.5 It is important to be clear that:
  - **Defining scenarios** is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
  - Assessing scenarios is the responsibility of the SEA consultant.
  - Selecting a preferred scenario is the responsibility of the plan-maker.

## Structure of this part of the report

- 4.6 This part of the report is structured as follows:
  - Chapter 5 explains the process of defining scenarios;
  - Chapter 6 presents the outcomes of assessing scenarios;
  - Chapter 7 explains reasons for supporting the preferred approach.

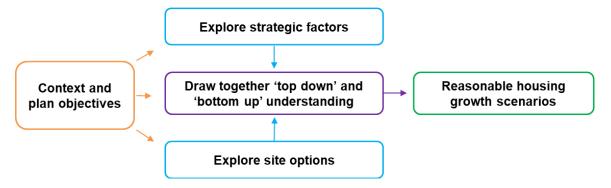
## 5. Defining scenarios

#### Introduction

5.1 The aim here is to explain a process that led to the definition of a reasonable range of housing growth scenarios for assessment, and thereby present "an outline of the reasons for selecting the alternatives dealt with".

5.2 Specifically, there is a need to: **1)** explain strategic factors with a bearing on defining scenarios; **2)** discuss work completed to examine site options (i.e. sites potentially in contention for allocation); and then **3)** explain how the 'top down' and 'bottom up' understanding generated through steps (1) and (2) were married together in order to arrive at reasonable housing growth scenarios.

Figure 5.1: Defining scenarios



## **Strategic factors**

- 5.3 The aim of this section is to explore the strategic factors with a bearing on the establishment of reasonable housing growth scenarios. Specifically, this section of the report explores:
  - Quantum how many new homes must the FNP provide for?
  - Broad distribution broadly where is more/less suited to allocation?

#### Quantum

- 5.4 The LPP1 identifies Frodsham as a key service centre within the Rural Area allocating 'at least' 250 new dwellings there, over the 20-year period between 2010 and 2030. Paragraph 5.75 explains that Frodsham is inset within the Green Belt and paragraph 5.66 adds 'where a key service centre'. However, there have been 2,655 housing completions and commitments in key service centres, 4,175 in total for the rural area since April 2014 (LPP1 Table 5.1). The LPP1 states, 'there is only a very limited amount of additional housing to be provided' (Paragraph 5.69).
- 5.5 It is good practice to provide for a 'supply buffer' on top of the requirement. For example, the plan might aim for a 10-20% buffer over-and-above LPP1's 250 housing requirement figure, which would suggest a need to identify a total supply of around 275-300 homes for Frodsham.

<sup>6</sup> Schedule 2(8) of the SEA Regulations.

#### **Broad distribution**

5.6 There are several broad spatial considerations influencing housing growth scenarios in the NP area. The town is physically constrained by the North Cheshire Green Belt which surrounds it, covering most of the NP area. The LLP1 states that a 'key focus of the Plan's strategy is to channel the majority of new development towards the main urban areas. In order to meet future development needs to 2030 and to promote sustainable patterns of development, it has been identified that only in the case of Chester are there exceptional circumstances to amend the Green Belt boundary.' Therefore, there is no provision for Green Belt release at strategic level.

- 5.7 There are heritage designations including a conservation area in the town centre, extends linearly along Main street/ High Street between the M56 and the railway line. Properties survive from the medieval period. Timber-framed and thatched cottages sit next to red brick and slate dwellings and more substantial and formal Georgian, Victorian and Edwardian structures. There are numerous listed and locally important buildings, including some unique structures listed buildings, a Scheduled Monument and a Registered Park and Garden.
- 5.8 A number of important biodiversity designations exist within Frodsham and the surrounding area including; the Mersey Estuary Ramsar (also SSSI and SPA site), the Frodsham Railway and Road Cuttings SSSI, Beechmill Wood and Pasture SSSI and the Dunsdale Hollow SSSI. The Impact Risk Zones (IRZ) associated with these SSSIs covers the entirety of the NP area.
- 5.9 Parts of the wider area surrounding the settlement are also identified as being at risk of flooding with areas of flood risk zone 3 extending along the length of the M56 running through the NP area. Further Flood Zone 3 areas are found along the coast and the course of the River Weaver.

## Site options

- 5.10 Having discussed strategic, 'top-down' factors with a bearing on establishing housing growth scenarios, the next step is to consider the site options that are in contention for allocation.
- 5.11 A key starting point is the Site Options Assessment (SOA, 2018), which examines sites, classifying the suitability of each for development on a three point (redamber-green) scale. The assessment considers all the sites in the Cheshire West and Chester Housing and Economic Land Availability Assessment (HELAA) 2017 assessed as being suitable, viable and achievable for development. The SOA also assessed sites produced by FNP Call for Sites (CfS).
- 5.12 The assessment covered 24 sites; the 11 sites produced by the CfS and 13 additional sites from the HELAA<sup>7</sup>. A 'traffic light' rating of all sites was used, based on whether the site is an appropriate candidate to be considered for allocation in the Neighbourhood Plan. The traffic light rating indicates 'green' for sites that show no constraints and are appropriate as site allocations, 'amber' for sites which are potentially suitable if issues can be resolved and 'red' for sites which are not currently suitable. The judgement on each site is based on the

<sup>&</sup>lt;sup>7</sup> The HELAA considered 20 sites in total within Frodsham, 4 of these were duplicated and considered within the CfS sites, 2 were discounted due to being in the Green Belt and 1 discounted due to availability issues.

three 'tests' of whether a site is appropriate for allocation – i.e. that it is **suitable**, **available and achievable**.

- 5.13 The SOA concludes that 9 sites would be appropriate for allocation in the FNP. However, since the SOA, the site at 3-15 Bridge La. is no longer available, the site at 29 Main St. (the Cheshire Cheese site) has been developed and the Ship Street Playing Field (FRO/060A) site is being proposed as an amenity green space. These sites are shown crossed out in the table below.
- 5.14 Three further sites were assessed as potentially suitable for development, but their availability could not be confirmed at the time. One of these, the Brook Works site, is now potentially available and therefore included in the list of potential sites below (Table 5.1).

Table 5-1 SOA sites assessed suitable for allocation in the FNP

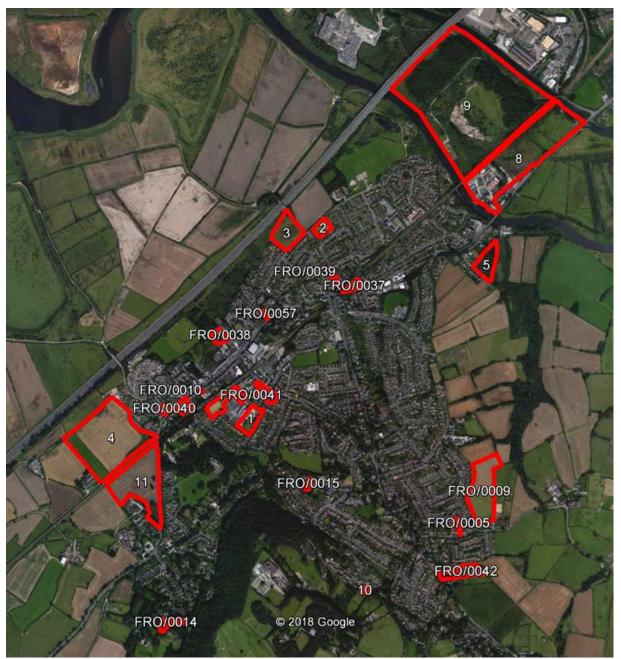
SOA or CfS		RAG
Reference	Location	Rating
1	Land Behind Health Centre	
FRO/0060	Ship Street Playing Field (now proposed as amenity green space)	
FRO/0004	Land at Penkmans Lane	
FRO/0005	Brereton House, Bradley Lane	
FRO/0037	3-15 Bridge Lane (No longer available)	
FRO/0038	Land off Greenfield Lane	
FRO/0039	Land to rear of 15-23 St Hilda's Drive	
FRO/0040	29 Main Street (now developed)	
FRO/0010	64 Main Street	
7	Brook Works <sup>8</sup> (previously unavailable)	

5.15 The remaining 12 sites were judged unsuitable for allocation (9 in the Green Belt, 2 were under construction and 1 deemed to be not in conformity with national planning policy on playing fields).

9

<sup>&</sup>lt;sup>8</sup> This site was rated red as it was unavailable at the time – The FNP Steering Group have now confirmed that the site may be available and wish to include it in the FNP.

Figure 5-2 Map of Sites assessed in the SOA



#### The reasonable scenarios

5.16 To recap, the housing requirement figure for Frodsham is 250 dwellings (up to 2030). CWCC's latest Annual Monitoring Report (2021)9 shows there have been 183 dwelling completions in Frodsham (2010-2021), leaving 67 units to be provided by 2030. The report also states that there are 33 commitments (applications with extant planning permission). Therefore, if completions and commitments are taken into account, the residual housing requirement is 34 dwellings.

5.17 The potential dwelling capacity of the available sites (as assessed in the SOA and currently available) is shown in in Table 5-2 below.

Table 5-2 List of available development sites

Site (FNP policy ref)	Area (ha)	Capacity <sup>10</sup>
Land Behind Health Centre (S/01A)	0.84	65
Land at Penkmans Lane (S/10A)	0.1	2
Brereton House, Bradley Lane (FRO/005A)	0.1	2
Land off Greenfield Lane (FRO/0038A)	0.36	10
Land to rear of 15-23 St Hilda's Drive (FRO/0039A)	0.11	5
64 Main Street (FRO/0010A)	0.1	1
Brook Works (S/07)	0.32	12

- 5.18 In conclusion, on the basis of the discussion above (i.e. all of Section 5, read as a whole), these are the potential housing growth scenarios for assessment:
  - Not to allocate any further development in Frodsham as the NP has fulfilled over 80% of the development requirement (and could therefore rely on windfall development). Given the locally assessed housing need this is considered an unsustainable option and therefore does not constitute a reasonable alternative.
  - Allocate the largest brownfield site, Land Behind Health Centre, as this would be sufficient to deliver the residual housing requirement including a supply buffer (when completions and commitments are taken into account).

<sup>&</sup>lt;sup>9</sup> Cheshire West & Chester Council Local Plan Annual Monitoring Report 2021 available at 

• Pursue a higher growth scenario developing all the sites in Table 5.2, maximising growth to help meet identified housing need.

## 6. Scenarios assessment

#### Introduction

The aim of this section is to present assessment findings in relation to the two reasonable housing growth scenarios introduced above, and set out in Table 6.1.

Table 6-1 The reasonable housing growth scenarios

	Scenario 1	Scenario 2
Supply		
Frodsham residual housing requirement <sup>11</sup>	34	34
Main brownfield site; Land Behind Health Centre	65	65
Remaining sites assessed in the SOA as suitable for allocation plus the Brook works site	32	-
Total new supply to 2030	97	65
Housing competitions and commitments	216	216
Total new supply + completions and commitments	313	281
% difference from CWCC HRF (250)	+25%	+12%

## **Assessment findings**

- Table 6.1 presents assessment findings in relation to the two scenarios.
- With regards to methodology: Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' on the baseline (using red, amber and light green and dark green)<sup>12</sup> and also rank the alternatives in order of performance. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

<sup>&</sup>lt;sup>11</sup> The housing requirement figure of 250 dwellings minus completions and commitments.

<sup>12</sup> Red indicates a significant negative effect, amber a negative effect that is of limited or uncertain significance; light green a positive effect that is of limited or uncertain significance; and dark green a significant positive effect. No colour is assigned where effects are considered to be neutral or uncertain.

6.4 The appraisal matrix is followed by a discussion, setting out reasons for the appraisal conclusions reached, with reference to available evidence.

Table 6-1: Housing growth scenarios assessment

Topic	Scenario 1		Scenario 2	
Air Quality	=		=	
Biodiversity	2 2		1	1
Climate change (adaptation)	=		=	
Health & Wellbeing	1		2	
Historic environment	1		2	
Landscape	=		=	
Population & housing	1		2	
Transportation	=		=	

#### **Discussion**

- 6.5 The assessment shows a mixed picture, with each of the scenarios associated with pros and cons. Scenario 1 is best-performing in respect of the most topics (four versus two); however, it does not automatically follow that Scenario 1 is best-performing overall, as the topics are not assumed to be of equal importance. It is for the decision-maker (also consultees), not this assessment, to assign weight to the various pros and cons and then arrive at a conclusion on which scenario is best-performing overall. The following paragraphs explore the growth scenarios under the SEA framework.
- 6.6 Air quality There is an AQMA in Frodsham at Fluin Lane. Successive CWCC air quality annual status reports have shown no exceedance in the NO2 emissions at the AQMA and the AQMA is likely to be reviewed according to the latest report. Both scenarios perform well, in terms of minimising the need to travel and supporting modal shift away from the private car (by virtue of the sites being within the urban area with good access to services). Overall, the level of growth proposed, even when considered in combination with the Local Plan allocations, is unlikely to give rise to significant adverse effects on air quality. The increase in traffic associated with new development is counteracted by well-located development sites with good access to services and facilities. The provision of EV charging infrastructure and promotion of enhanced pedestrian and cycle links should encourage more sustainable modes of travel. There is little difference between the two scenarios in terms of growth proposed (Scenario 2 produces 32 fewer units than Scenario 1) therefore both scenarios perform comparably with broadly neutral effects expected overall.
- 6.7 Biodiversity mixed effects are considered likely; the proposed housing site allocations are not expected to give rise to adverse effects on biodiversity but Policy EDVE2 has the potential for minor negative effects as it is likely to increase recreational pressures on the Frodsham Marshes and the Mersey Estuary biodiversity sites. Minor positive effects are predicted for policies GSRL1,3 and 4 as these will result in the protection and enhancement of open greenspaces within the Parish which would help reduce habitat fragmentation and provide stepping stones for biodiversity. Since both scenarios share the above mentioned policies there is relatively little difference in how the two scenarios perform with respect to biodiversity.

Scenario 2 may be marginally preferable due to the lower growth proposed (lesser associated recreational pressure from residents). However, if the FNP incorporates the recommendations suggested herein and in the HRA, both scenarios are likely to produce minor positive effects overall.

- 6.8 Climate change (adaptation) the key consideration is flood risk. The FNP places development in areas of low flood risk and none of the sites in question are subject to significant constraint. There are several policies seeking to protect and provide green open space and restore marshland. These are likely to produce favourable effects on adaptation as such spaces help reduce flood risk and act as carbon sequesters contributing directly to a reduction in atmospheric CO2 concentration. In conclusion, the scenarios are judged to perform broadly on par having minor long-term positive effects on climate change adaptation.
- **Health and wellbeing** The main considerations are the provision of high quality public realm, the provision of open green and recreational space and encouraging active travel. In this context the Frodsham Design Code and FNP policies H2 and H5 are important as they seek to promote high quality development design. Other policies seek to protect and enhance open green space including recreational and play areas (GSRL1-4). Active travel is also promoted through FNP policies (H1) which facilitate active travel by placing residential development in well located sites, close to services and facilities, whilst other policies (e.g. H5, CA1, CA2) require new development to provide safe pedestrian access and footway connections to nearest walking/cycling routes (H5, CA1) and seek to make Frodsham a cycle friendly town. As both scenarios share the above policies it is difficult to confidently differentiate the scenarios in these respects. Clearly, housing conditions can influence physical and mental health and having a suitable, well designed, affordable home is important to health and wellbeing. In this respect Scenario 1 is marginally preferable as it provides more housing growth than Scenario 2. In conclusion both scenarios are predicted to have minor long term positive effects on health and wellbeing.
- 6.10 Historic environment Two of the housing sites allocated in scenario 1 (at 64 Main Street and at Brook Works) were assessed in the SOA as potentially impacting the historic environment. However, the mitigation provided through the FNP Design Code, policy H6 and the policies allocating the sites in the FNP should ensure appropriate developments that do not adversely impact the historic environment and the setting of the Frodsham Conservation Area. The policies have the potential for positive effects as they will help ensure the continued use of heritage assets such as the Grade II listed Brook House. Scenario 2 does not include these two sites and therefore no significant effects are anticipated (positive or negative). In conclusion, although Scenario 1 has minor constraints with respect to the historic environment, the mitigation provided through the Design Code and FNP policies should ensure no significant adverse effects are produced (the views of Historic England will be sought through the consultation). Minor positive effects are expected through FNP policies which seek to retain the Brook Works site and ensure its continued use into the future. Scenario 1 is therefore judged to be preferable to Scenario 2 in this respect.
- 6.11 **Landscape** The spatial strategy allocates housing growth within the existing urban built-up areas of the town. The SOA concluded that all the

sites allocated for development are in areas of relatively low landscape sensitivity. The FNP Design Code and FNP polices such as GSRL1 (Protecting our green spaces) and H2 (Housing layout and design) are predicted to have beneficial impacts on the landscape character of Frodsham, serving to protect keys aspects of the landscape such as open green spaces and important view and vistas. Both scenarios perform comparably with both predicted to have **neutral effects** on Landscape. Despite more sites being allocated in scenario 1, the sites are of a low sensitivity, and therefore effects are no greater than for scenario 2.

- 6.12 **Population and housing** the primary consideration is meeting housing needs in Frodsham. On this basis, there is a clear preference for Scenario 1, which would meet and exceed (by 25%) the housing requirement set by the CWCC Local Plan. Whilst Scenario 2 would also meet the Local Plan HRF (12% more than the HRF), there would be fewer homes in total, and there could feasibly be a degree of delivery risk associated with one or more of the sites. The FNP steering committee's housing survey highlighted the need for affordable tenures such as Starter Homes, social, rented and shared ownership tenures which are seen as a priority to enable younger residents to remain in the area. Therefore Scenario 1's larger growth is likely to deliver greater choice of tenures in the market to meet the needs of residents. In conclusion, Scenario 1 leads to a prediction of **significant positive effects**. Scenario 2 performs less well, but still gives rise to **minor positive effects**.
- 6.13 **Transportation** key issues around minimising the need to travel, supporting modal shift away from the private car and supporting safe walking/cycling are discussed above. Both scenarios benefit from FNP policies locating development sites in well-connected locations with good access to local services and policies requiring development proposals to provide safe pedestrian access and footway connections to nearest walking/cycling routes which should encourage active travel and reduce car journeys. At the scale of growth involved for either scenario, it is considered unlikely that major infrastructure improvements would be achieved associated with housing growth. In conclusion, the scenarios perform comparably with **minor negative effects predicted** due to the increase in traffic associated with housing growth. Scenario 2 is marginally preferable in this respect due to the lower growth.

## 7. The preferred approach

#### Introduction

7.1 The aim of this section is to present the plan-makers reasons for supporting the preferred approach, in light of the scenarios assessment presented above.

## Reasons for supporting the preferred approach

- 7.2 The preferred approach is to take forward Scenario 1 as the basis for the FNP. This approach is considered to broadly align with the findings of the assessment, which finds Scenario 1 to perform well in terms of the majority of key sustainability issues, both in absolute terms and relative terms.
- 7.3 With regards to Scenario 2, the assessment highlights that it does not perform quite as well in terms of health and wellbeing, heritage and housing delivery. Conversely, this option performs marginally better in terms of biodiversity.
- 7.4 The process of defining and assessing growth scenarios serves to highlight that there is little to differentiate the scenarios in respect of planning for growth at Frodsham. Nonetheless, there is a need to make a choice, and Scenario 1 is considered to be most appropriate on balance in terms of sustainable development. Importantly, the preferred approach will deliver benefits to the Neighbourhood Area and meet the requirements set out in the Local Plan.

## Part 2: What are the SEA findings at this stage?

## 8. Introduction (to Part 2)

8.1 The aim of this section is to present an assessment of the current 'presubmission' version of the FNP which includes 25 policies to guide development in the Neighbourhood Plan area. These are set out in Table 8.1 below.

#### **Table 8-1 FNP policies**

Policy no.	Title	
H1	Location of housing development	
FRO/005A	Brereton House, Bradley Lane	
FRO/005B	Design Principles/ requirements	
FRO/0010A	64 Main Street	
FRO/0010B	Design Principles/ requirements	
FRO/0038A FRO/0038B	Land off Greenfield Lane Design Principles/ requirements	
FRO/0039A	Land to the rear of St Hilda's Drive	
FRO/0039B	Design Principles/ requirements	
FRO/0040A	29 Main Street	
FRO/0040B	Design Principles/ requirements	
FRO/0060A	Land off Ship Street	
FRO/0060B	Design Principles/ requirements	
S/01A S/01B	Land at Frodsham Health Centre	
-	Design Principles/ requirements  Brook Works Main Street	
S/07A S/07B	Design Principles/ requirements	
S/10A	Land at Penkman's Lane	
S/10B	Design Principles/ requirements	
H2	Housing Layout and Design	
H3	Housing Mix and Design	
H4	Affordable Housing – The Local Connection Test	
H5	Design and Character	
H6	Heritage assets	
EDVE1	Business and Employment	
EDVE2	Tourism and the Visitor Economy	
EDVE3	Retail and Services	
GSRL1	Protecting our Green Spaces	
GSRL2	Developing Existing and New Activities	
GSRL3	Maintaining our Green Spaces	
GSRL4	Creating New Green Spaces	
CA1	Infrastructure with development	
CA2	Cycle access and connectivity	
CA3	Application of Section 106 and other funding agreements through development	

## **Methodology**

8.2 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.

- 8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.4 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. For example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the FNP to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

## 9. Assessment of the FNP

## Introduction

9.1 The assessment is presented below under eight topic headings, reflecting the established assessment framework (see Section 3). A final section (Chapter 10) then presents overall conclusions. Throughout the assessment consideration is given as to whether measures can be implemented to mitigate negative effects and maximise positive effects.

## Air quality

- 9.2 Air quality is an important issue in Frodsham, given the AQMA at the junction of Fluin Lane and Bridge Lane. The AQMA was designated in 2015 due to exceedance of the annual mean NO<sub>2</sub> objective, mainly due to road traffic emissions. The latest data from CWCC's monitoring network indicates that the NO<sub>2</sub> objective was not exceeded at residential properties in Frodsham and no exceedance of the PM10 national objectives has been recorded in the AQMA. Similarly, PM2.5 monitoring shows that background levels were well below EU limits<sup>13</sup>.
- 9.3 CWCC's Air Quality Annual Status Report (2020/2021) states that; 'there is a discernible downwards trend in NO2 and PM10 concentrations over time'. The report also states that CWCC has installed numerous EV charging points and plans to expand the charging network significantly over the next few years.

<sup>13</sup> CWCC 2020/2021 Air Quality Annual Status Report (Sept. 2021)

9.4 Other measures being pursued by CWCC to encourage the switch to electric vehicles include the use of planning conditions on new developments, revised parking standards and the trialling of an e-scooter scheme. Whilst some of the recent decline in emissions may be associated with Covid-19 and working from home, earlier, pre-pandemic, air quality reports show similar trends for the Frodsham AQMA.

- In terms of housing allocations, the sites allocated in the FNP are within existing urban areas and centrally located with good access to services and facilities. The largest site allocated; Land behind the Health Centre, is around 700m (as the crow flies) from the AQMA. However, this brownfield site is well located with good access to public transport (including the railway station), health, leisure, retail facilities and employment opportunities, all of which should significantly reduce the number and frequency of car journeys. Some of the policies within the FNP such as H1 (Location of housing development) are potentially positive as they support active travel by locating development in accessible locations including brownfield sites within the settlement boundary. Policies H5 (Design and character) and CA1 (Infrastructure development) are also positive with respect to air quality as they require development proposals to provide safe pedestrian access and footway connections to nearest walking / cycling routes; which is likely to facilitate active travel, potentially reducing car journeys.
- 9.6 Policy CA1 requires the provision of EV charging points in all new developments. Policy CA2 (Cycle access and connectivity) is likely to encourage cycle journeys as it seeks to make Frodsham a cycle friendly town by supporting proposals that implement the recommendations set out in a Cycle Strategy for Frodsham. The latter suggests improvements to make 'Frodsham a sustainably connected and cycle friendly town in order to satisfy the needs of those cycling to places of education, employment and leisure 14. The strategy includes a safe cycle route linking the Town Centre and Overton to Helsby High School with connections further afield linking Chester, through Frodsham to Runcorn and Warrington via a single scheme. Connection to Runcorn and Warrington (important for commuters) are also proposed. Recreation and leisure routes are also proposed through the Weaver Valley and at Lady Heyes, Kingsley Village and Delamere Forest. These would potentially enable access to services and facilities within Frodsham and Kingsley.
- 9.7 Overall, the level of growth proposed, even when considered in combination with the Local Plan allocations, is unlikely to give rise to significant adverse effects on air quality. The increase in traffic associated with new development is counteracted by well-located development sites with good access to services and facilities. Furthermore, the provision of EV charging infrastructure and promotion of enhanced pedestrian and cycle links should encourage more sustainable modes of travel. As a result, no significant deviations from the baseline are anticipated, and broadly neutral effects are concluded overall.

<sup>&</sup>lt;sup>14</sup> Cycle North Cheshire report "A Cycle Strategy for Frodsham"

## **Biodiversity**

9.8 There are several international, European and national, protected biodiversity sites within the Neighbourhood Plan area. These include Mersey Estuary SSSI, SPA and Ramsar site, Beechmill Wood and Pasture SSSI, Frodsham Railway and Road Cuttings SSSI and Dunsdale Hollow SSSI. Additionally, there are several Local wildlife Sites (LWS) such as at Frodsham and Overton Wood, East Clifton Top, Sutton Bridge Lagoon, Frodsham Marshes and Hob Hey Wood. The Mersey Estuary also overlaps part of the North West Marine Plan area. These and other significant habitats in Frodsham are given protection at strategic level through policies in the Cheshire West and Chester Local Plan Parts 1 and 2.

- 9.9 In terms of housing sites, all of Frodsham parish is within the Impact Risk Zone of up to three SSSIs, namely Beechmill Wood and Pasture, Dunsdale Hollow, and Frodsham Rail and Road Cuttings. However, the site check (GIS data in Magic Map) indicates that developments of 50 or more residential units outside of the existing settlements / urban areas would require consultation with Natural England on likely risks. The only site in the FNP that is larger than 50 units is at Land behind the Health Centre which is allocated for up to 60 dwellings but the site is within the existing settlement/ urban area of Frodsham and therefore does not fall within the categories requiring consultation with NE. However, cumulatively, new residential developments in this area should consider recreational disturbance impacts on the coastal designated sites (Mersey Estuary). This issue was considered in the Habitats regulations assessment (HRA) of the FNP<sup>15</sup>.
- 9.10 The HRA considered the impacts of the FNP on European sites in the FNP area. This included several possible impact pathways including air pollution, water pollution and recreational pressures. At the screening stage, one site; the Mersey Estuary Ramsar SPA was identified as being potentially susceptible to recreational pressure. The HRA identified (screened-in) two FNP policies; H1 (Location of housing development) and EDVE2 (Tourism and visitor economy) as likely to have significant effects and assessed further to ascertain their likely effects on Mersey Estuary Ramsar SPA. The remaining policies were screened out as they are not likely to produce significant effects. The proposed housing sites allocated by the FNP are within 4.5km of the Mersey Estuary Ramsar and SPA. The closest site to the SPA boundary is FRO/0039 (Land to rear of 15-23) St Hilda's Drive), which is 2.3km away. Residential development within the FNP area may lead to increased visitors to the Mersey Estuary Ramsar/SPA when considered in-combination with growth across the district (including the amount of housing allocated for Frodsham in the Local Plan) and in surrounding districts. However, Frodsham is relatively isolated from the SPA/Ramsar due to the M56. Frodsham Marsh and the Manchester Ship Canal. The most accessible parts of the SPA/Ramsar are on the opposite side of the River Mersey. Consequently, growth in Frodsham would probably make a very minor contribution to recreational pressure in the SPA/Ramsar site.
- 9.11 Policy EDVE2 (Tourism and the visitor economy) seeks to enhance visitor attractions in Frodsham and promote the future use of the marshes, the Weaver navigation and the adjoining riverside and the Sandstone Ridge. The policy is likely to result in increased visitor numbers to these areas with an associated increase recreational pressures on the sensitive receptors such as the Frodsham

<sup>15</sup> AECOM report (Oct. 2021) "Habitats Regulations Assessment: Frodsham Neighbourhood Plan"

Marshes. The latter also serves a valuable role in providing supporting habitat for the Mersey Estuary/ Ramsar site. The HRA identified recreational pressures as an impact pathway on the Mersey Estuary. The policy requires proposals to 'to demonstrate that potential effects on biodiversity, noise and environmental impacts have been explored and avoidance and mitigation measures employed', therefore only **minor negative effects** are likely in terms of effects on biodiversity.

- 9.12 There are several policies within the FNP seeking to protect and enhance green and recreational space provision in the Parish. Policies GSRL1 (Protecting our green spaces) and GSRL3 (Maintaining our green spaces) and GSRL3 (Creating new green spaces) support the designation and protection of Frodsham's local green spaces affording priority to developments that retain, protect and provide new green space for communal use. The accompanying text to GSRL1 includes an extensive list of potential sites for designation as Local Green Space. Policy GSRL4 supports developments that restore Marshland Nature Reserve to a SSSI and GSRL3 promotes enhancing community gardens and orchards. The spaces identified in these policies serve an important function as biodiversity habitats and maintaining them can help reduce fragmentation resulting from development. Therefore, this set of policies is likely to produce positive effects on biodiversity.
- 9.13 Overall, mixed effects are considered likely; the proposed housing site allocations are not expected to give rise to adverse effects on biodiversity (neutral effects) but Policy EDVE2 has the potential for adverse effects as it is likely to increase recreational pressures on the Frodsham Marshes and the Mersey Estuary biodiversity sites. The HRA recommended that the FNP adds a caveat requiring developers to provide homeowner packs to new residents identifying disturbance sensitivity of the wintering waterfowl in the Mersey Estuary and Frodsham Marsh, encouraging responsible dog ownership and identifying alternative accessible greenspace that could be visiting and dog walking. The HRA also recommended that the section promoting future use of the marshes is removed as it could conflict with avoidance of recreational disturbance impacts on functionally linked habitat for the Mersey Estuary SPA/Ramsar site. Having said that, policy EDVE2 includes the requirements for proposals to demonstrate appropriate avoidance and mitigation measures. therefore only minor effects are likely. Minor positive effects are predicted for policies GSRL1.3 and 4 as these will result in the protection and enhancement of open greenspaces within the Parish which would help reduce habitat fragmentation and provide stepping stones for biodiversity.

## Climate change (adaptation)

- 9.14 In terms of climate change adaptation, the NP area falls predominantly within Flood Zone 1, although there are stretches of Flood Zone 2 and 3 running along the Mersey Estuary, the River Weaver and a band along the M56. There is potential for surface water flooding to occur across the FNP area, although areas susceptible to this are scattered amongst areas with lower risk of fluvial flooding.
- 9.15 In terms of housing site allocations; all of the sites allocated in the FNP are in areas at low risk of flooding (Flood Zone 1). In this respect, neutral effects are anticipated.

9.16 Well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Green open spaces provide several flood mitigation features; by providing space for flood water, reducing permeability of built-up areas and attenuating surface water flow. Enabling and providing for green infrastructure within Frodsham is therefore a key means to promoting climate change adaptation measures within the FNP.

- 9.17 In this context, policies GSRL1 (Protecting our green spaces) and GSRL3 (Maintaining our green spaces) and GSRL3 (Creating new green spaces) which support the designation and protection of Frodsham's local green spaces are likely to have beneficial effects. Also, likely to be beneficial is policy GSRL4 as it seeks to restore the Marshland Nature Reserve because such areas provide valuable flood water storage. Areas of green, open space also offer climate change mitigation services through carbon sequestration and a reduction in urban heat island effects. Therefore, this set of policies is expected to have positive effects on climate change adaptation.
- 9.18 Overall, the avoidance of placing development in areas of high flood risk, alongside measures to increase climate resilience through the protection, enhancement and provision of green open space are considered to have **minor** long-term positive effects on climate change adaptation.

## Health and wellbeing

- 9.19 The health and wellbeing of residents will be supported by FNP policies which support a high-quality public realm (through the FNP Design Code which is a supporting document to the FNP), local distinctiveness and landscape / townscape character. This is discussed to some extent under the 'Landscape' and 'Historic Environment' SEA themes below. Policy H5 (design and character) requires new development to demonstrate adherence to the design principles and guidance in the Frodsham Design Codes and the Frodsham Town Design Statement. Policy H2 (Housing layout and design) requires all developments to respect views and vistas in Frodsham and include appropriate planting schemes wherever possible.
- 9.20 A high-quality living environment will also be supported through GSRL set of policies (GSRL1 to 4), which seek to protect (including through Local Green Space designations) and enhance the Plan area's most valued open and green spaces. Community engagement highlighted that parks, gardens, recreation facilities and green spaces, are all highly valued and appreciated by residents and visitors. This set of policies give priority to developments that retain, protect and provide new green space for communal use. The accompanying text to GSRL1 includes an extensive list of potential sites for designation as Local Green Space including play areas and formal and informal recreation areas. The health benefits of such spaces is highlighted in GSRL2 which promotes developments that enhance foot and cycle paths and embed physical activity e.g. through the provision of public exercise equipment in parks in green spaces.
- 9.21 Residents' health and wellbeing is further supported by policies (H1) which facilitate active travel (walking and cycling) by locating development in accessible locations including centrally located brownfield sites within the settlement boundary. Similarly, the FNP requires developments to provide safe pedestrian access and footway connections to nearest walking/ cycling routes (H5, CA1) and aims to make Frodsham a cycle friendly town (CA2).

9.22 It is considered that the FNP will support health indicators relating to housing by providing high-quality new homes that meet identified local housing needs. The FNP allocates around 97 new homes to enable the delivery of sustainable housing tailored to meet the needs of the parish. This will enable the FNP to meet and exceed CWCC's housing requirement for the NP area thus ensuring flexibility in the type, size and affordability of new homes in the parish.

9.23 Overall, the proposed spatial strategy and policy provisions seek to protect resident health and wellbeing, deliver improved public realm, open green and recreational spaces and promote active travel opportunities. As a result, minor long-term positive effects on health and wellbeing are anticipated.

## **Historic environment**

- 9.24 There are numerous historic environment assets which contribute to the attractiveness and character of Frodsham. Future growth in the Plan area has potential to affect the setting and significance of assets.
- 9.25 In terms of housing site allocations, two of the allocated sites (at 64 Main Street and Brook Works) were assessed in the SOA as potentially impacting the historic environment. The 64 Main St. site (FRO/0010) is within the Frodsham conservation Area (CA) and is adjacent to a Grade 2 listed entrance / gates associated with the Army Premises next door. The site, currently a restaurant, is allocated for 1 dwelling in Policy FRO/0010A/B. The policy requires that the building is retained or converted in keeping with the current scale and respecting the character of the CA setting. It also requires that any work carried out should minimise the effect on the adjacent Grade II listed structure. Materials and architectural style should respect the existing character and the CA setting. Given the existing commercial premises in this location and with appropriate mitigation (as provided through the policy) it should be possible to develop this site without adversely impacting the adjacent listed building and the character and setting of the CA.
- 9.26 The Brook Works site is allocated for up to 12 residential units as well as business use in policy S/07A. The site comprises Brook House, a Grade II listed building which is currently used for residential and business use (small workshops). The policy stipulates that the Grade II listed building should be retained and the heights, and materials used in any development should respect the existing setting and the CA. The policy is potentially positive as it would help ensure this heritage asset remains in use into the future. The policy provisions should help ensure a development that is appropriate to the character and setting of the CA.
- 9.27 Policy H6 (Heritage assets) states that development should protect or enhance both designated and non-designated heritage assets and their settings. The policy stipulates that the special interest and character and appearance of the CA must be retained and seeks to preserve special features and traditional materials. The policy also promotes the sensitive re use of redundant heritage assets.
- 9.28 A primary plan aim is for Frodsham to 'value its community and heritage' with the associated objective to 'ensure the built environment fits in with the local character of Frodsham in terms of materials, scale, accessibility and sustainability'. The cumulative effects of growth on the historic environment could also have negative implications, particularly as a result of increased traffic and

congestion. The Plan seeks to combat this through well located (for facilities and services) and well connected developments that integrate pedestrian and cycle paths within developments and linking to surrounding streets, spaces and access to sustainable transport.

9.29 Overall, the potential for **minor positive effects** is recognised, namely through the policies seeking to preserve the character and settings of the historic environment including the CA and policies seeking to ensure the continued appropriate use of heritage assets and re-use of redundant heritage assets.

## Landscape

- 9.30 The spatial strategy in the FNP allocates housing growth within the existing urban built-up areas of the town. The SOA concluded that all the sites allocated for development are in areas of relatively low landscape sensitivity. The adopted Local Plan (CWCC LPP2) policy ENV2 (Landscape) seeks to protect and enhance landscape character and local distinctiveness by identifying key gaps with the objective of protecting these by maintaining their character, supporting designation of Local Green Space and protecting the borough's estuaries and undeveloped coast. Policy GBC2 includes Frodsham Hill in a list of Areas of Special County Value (ASCV) highlighting their special landscape character and scenic value. The policy states that such areas 'must be protected from development that would unacceptably harm their landscape character, appearance or setting'. However, depending on the scale of development, a lack of overall vision and framework could result in the delivery of less sympathetic development styles, layouts and material choice. In this context the FNP's Design Code (FDC) is central as it seeks to ensure the preservation of the character of Frodsham's landscapes. This includes requirement that 'development should be planned to respond to existing view corridors...' and 'key vistas should be protected by controlling development densities and building heights, particularly when in the sight lines of local landmarks.' The FDC also advocates 'high quality designs which use local materials, forms, massing and detailing to reflect the existing built fabric of Frodsham'. Frodsham's heritage assets and townscape character are also offered protection in the FDC which states that 'developments will be required to respect and respond positively to these assets, and must 'protect or enhance both designated and non-designated heritage assets, and the character and setting of areas of acknowledged significance'. Development would be required to 'respect the existing character area and conservation area setting, including minimising any work that may affect the heritage assets located near to any development'.
- 9.31 Other policies within the FNP such as GSRL1 (Protecting our green spaces) and H2 (Housing layout and design) will also have beneficial impacts on the landscape character of Frodsham, serving to protect keys aspects of the landscape such as open green spaces and important view and vistas.
- 9.32 Overall, given that the proposed development sites are in areas of low landscape sensitivity with policy mitigation provided at strategic and neighbourhood levels (as well as through the FNP Design Code), then **neutral effects** are predicted on landscape.

## Population and housing

9.33 Local Plan policies STRAT 2 to STRAT 8 (LPP1) seek to ensure that new development in Cheshire west and Chester is brought forward in line with identified needs. The Plan also makes provision for a specific level of development to be brought forward in Frodsham, identified as one of ten Key Service Centres. The Plan allocates 250 dwellings in Frodsham (Policy STRAT8). Policy ECON2 seeks to maintain the important role of Frodsham's town centre as a retail and service centre.

- 9.34 Policies SOC3 and SOC5 (LPP1) support mixed, balanced, sustainable communities through the provision of market and affordable housing that meets identified future needs.
- 9.35 The FNP policies (FRO/005/0010/0038/0039 and S/01/07/10) seek to deliver around 97 new homes across 7 sites, within the existing urban settlement of Frodsham. The sites in order of size are listed below:
  - The largest site is at Land behind Frodsham Health Centre (policy S/01A); a large (0.84ha) brownfield site (former school) within 200m of the retail and service centres at Church St and Main St. The site is allocated for a high density development of up to 65 dwellings. The scheme is envisaged to help provide smaller homes for older residents looking to downsize as well as starter homes for young families.
  - Land off Greenfield Lane (policy FRO/0038) is allocated for up to 10 dwellings and on the northern edge of Frodsham High street (currently Frodsham Sea Scouts HQ).
  - The Brook Works site is located for up to 12 units and comprises a Grade II listed building (currently in mixed residential and business use) located in the Frodsham Conservation area.
  - Land to rear of St Hilda's Drive (policy FRO/0039) comprises a 0.11ha plot within an existing residential area, surrounded by the rear gardens of properties on St Hilda's Drive and a 2-storey block of flats.
  - Three small sites at: Penkmans Lane (2 units allocated in policy S/10A), Brereton House, Bradley Lane (2 units allocated policy FRO/005) and 64 Main street (1 units in policy FRO/0010A).
- 9.36 The sites combined will provide up to 97 new homes. When completions (183) and commitments (33) are taken into account, a total of 313 new dwellings would be delivered over the Local Plan period (2010-2030). This represents a 25% uplift to the housing requirement figure for Frodsham thus meeting and exceeding the housing identified in the Local Plan. This additional provision serves to provide an element of flexibility in the housing choice (types, size and affordability). Therefore, significant long-term positive effects are anticipated in this respect.
- 9.37 The FNP seeks to complement Local Plan Policy SOC3 (Housing mix and type) which supports mixed, balanced, sustainable communities, providing a mix of housing types, tenures and sizes. The FNP policy H3 (Housing mix and type) requires proposals for new housing to provide a mix of house types, tenures and sizes that takes local needs into account. Policy H4 (Affordable housing the local connection test) requires development sites of 3 or more dwellings or

greater than 0.1ha to include 30% affordable housing (AH). This is to be provided in perpetuity and offered to those with local connection to Frodsham. These policies are predicted to have positive effects as they help offer a mix of types, sizes and tenure increasing choice in the market as well as providing AH.

- 9.38 Policy H4 should also help create sustainable communities by providing affordable options to younger residents and young families to remain in the area by offering them more affordable housing options. The FNP steering group conducted a housing needs survey that identified a need for downsizing to release larger properties that are currently under occupied.
- 9.39 This would be particularly beneficial to growing families in need of larger properties and would also benefit some of the older residents who may wish to live in smaller more manageable and / or suitably adapted properties. The site at Frodsham Health Centre (allocated in policy S/01A) is favoured by the community for such a development.
- 9.40 One of the aims of the FNP is to 'be...thriving and sustainable' with the accompanying objective to 'provide a mix of dwellings, that meet the needs of Frodsham now and in the future, and address the changing demographics and the towns sustainability'. This was echoed in the housing survey which highlighted the need for affordable tenures such as Starter Homes, social, rented and shared ownership tenures which are seen as a priority to enable younger residents to remain in the area.
- 9.41 Overall, **significant long-term positive effects** are anticipated as a result of the growth strategy, which will meet and exceed Frodsham's housing requirement figure thus providing a buffer to better secure housing delivery and potentially deliver more choice and flexibility in the local housing market. The housing policies are also likely to help younger residents to remain in the area ensuring the long term sustainability of Frodsham's community.

## **Transportation**

- 9.42 The NP area is connected to the strategic road network by the M56 which passes through the centre of the Plan area and connects Frodsham to Manchester, Warrington, Runcorn to the east and Ellesmere Port in the west. The A56 also connects Frodsham to Chester to the south and to Warrington in the north. There are several smaller B roads (B5393 and B5152) which provide access to the more rural parts of Frodsham to the south beyond the main settlement.
- 9.43 The Frodsham residents' survey highlighted concerns regarding traffic and congestion in the area. Traffic and congestion on the A56 have increased noticeably with the expansion of the Frodsham settlement boundaries, especially during busy periods. In residential areas, roads tend to have lower levels of traffic, but on-street parking contributes to congestion in some locations, particularly near schools and businesses at peak times.
- 9.44 The FNP addresses the traffic implications of additional development by locating development sites in well-connected locations with good access to local services, retail, health and leisure facilities. Policies such as CA1 (Infrastructure development) are also likely to have beneficial effects as they require development proposals to provide safe pedestrian access and footway connections to the nearest walking / cycling routes which should encourage active travel and reduce car journeys.

9.45 Policy CA2 (Cycle access and connectivity) is likely to encourage cycle journeys as it seeks to make Frodsham a cycle friendly town by supporting proposals that implement the recommendations set out in a Cycle Strategy for Frodsham. The latter proposes several cycle routes linking the Town Centre to schools and employment centres in neighbouring towns.

- 9.46 Several policies address the issue of on-street parking by requiring new development to include adequate off-street parking (CA1) and parking to be provided within the curtilage of new properties (FRO/005B, FRO/0038B, FRO/0038B).
- 9.47 This set of policies is potentially helpful in alleviating some of the on-street parking issues and associated congestion on residential roads described above.
- 9.48 Nearly half of residents rely on a private car to travel to work, 16 though the proportion of residents who work from home is higher in Frodsham than in the wider Borough. Working from home is likely to have increased substantially since the start of the Covid-19 pandemic. This positive trend in relation to transport is considered likely to prevail in the short term, further supporting reduced congestion at peak times, and subsequently contributing towards meeting climate commitments.
- 9.49 The FNP's policy GSRL1 is supportive of digital connectivity as it promotes the provision of high quality broadband / internet access throughout the town, including in parks and green spaces. This is potentially beneficial as it would enable more residents to work from their homes, local parks, public spaces, cafes or neighbourhood centres, instead of having to travel to an office. Similarly, policy EDVE1 identifies locations such as Brook House where offices, flexible light industrial units and 'working from home' business hubs are promoted. Having such facilities in centrally located premises would enable more residents to work locally without the need to travel further afield and /or commute to traditional places of work.
- 9.50 Overall, whilst measures are implemented to bolster sustainable transport connections, including active travel connections, minor long-term negative effects are anticipated as a result of a likely residual increase in vehicular traffic in the area.

## 10. Conclusions and recommendations

10.1 Overall, the Plan appraisal has served to highlight the potential for mostly positive effects. Significant **long-term positive effects** are anticipated in relation to the population and housing SEA theme as a result of the growth strategy which will meet and exceed strategic growth targets set in Local Plan; helping to improve choice and potentially affordability. The additional growth also serves to provide a buffer to better secure housing delivery. The provision of smaller dwellings (at the land behind Frodsham Health Centre) will help to facilitate downsizing for older residents who may wish to move to smaller more manageable homes and also enable young adults to get a foothold on the property ladder through affordable tenures (such as affordable rents and First Homes).

<sup>16</sup> 2011 Census

10.2 Neutral effects are predicted for the Air Quality SEA Theme as the small increase in traffic associated with new development is counteracted by well-located development sites with good access to services and facilities. Furthermore, the provision of EV charging infrastructure and promotion of enhanced pedestrian and cycle links should encourage more sustainable modes of travel.

- 10.3 Mixed effects are predicted with respect to biodiversity; whilst neutral effects are predicted in relation to the spatial growth strategy, potentially minor negative effects are predicted through Policy EDVE2 as it may lead to increased recreational pressures on the Frodsham Marshes and the Mersey Estuary biodiversity sites. It is recommended that the policy is revised according to the recommendations made in the HRA to:
  - The section regarding the future use of the marshes is removed as it could exacerbate recreational disturbance on the functionally linked Mersey Estuary SPA / Ramsar site.
  - Provide homeowner packs to new residents identifying disturbance sensitivity
    of the wintering waterfowl in the Mersey Estuary and Frodsham Marsh,
    encouraging responsible dog ownership and identifying alternative accessible
    greenspace that could be visiting and dog walking.
- 10.4 With these measures in place, potential adverse effects would likely be reduced.
- 10.5 **Minor positive effects** are anticipated on the historic environment through policies seeking to preserve the character and settings of the historic environment including the Frodsham Conservation Area and policies seeking to ensure the continued use of heritage assets and re-use of redundant ones.
- 10.6 **Minor positive effects** are expected in relation to health and wellbeing, predominantly reflecting the potential for; improved public realm, connected and resilient development, and the allocation of Local Green Space, walkways and cycle routes.
- 10.7 **Minor negative effects** on transportation are considered likely due to increased traffic and congestion within the Plan area.
- 10.8 **Neutral effects** are predicted on landscape as the proposed development sites are in areas of low landscape sensitivity with policy mitigation provided at strategic and neighbourhood levels as well as through the FNP Design Code.

## Part 3: What are the next steps?

Part 3 31

## 11. Plan finalisation

11.1 This Environmental Report accompanies the pre-submission version of the FNP for consultation. Following consultation, any representations made will be considered by the Neighbourhood Plan Committee, when finalising the plan for submission.

- 11.2 The 'submission' version of the plan will then be submitted to CWCC (alongside an Environmental Report Update, if necessary). The plan and supporting evidence will be then published for further consultation, and then submitted for examination.
- 11.3 If the outcome of the Independent Examination is favourable, the FNP will then be subject to a referendum, and the plan will be 'made' if more than 50% of those who vote are in support. Once made, the FNP will become part of the Development Plan for Cheshire West and Chester.

## 12. Monitoring

- 12.1 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 12.2 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by CWCC as part of the process of preparing its Annual Monitoring Report (AMR).
- 12.3 The SEA has not identified any potential for significant negative effects that would require closer monitoring.
- 12.4 A significant positive effect is predicted for the population and housing theme. It is suggested that the following monitoring measures be included in the AMR:
  - Annual net housing completions.
  - Affordable housing delivery.

Part 3 32

## **Appendices**

## **Appendix I: Meeting the Regulations**

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table Al.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table Al.2 explains this interpretation. Table Al.3 identifies how and where within this report the requirements have been met.

Table Al.1: Questions answered by this report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations, the report must include
Introduction	What's the plan seeking to achieve?		<ul> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SEA scope?	What's the sustainability 'context'?	<ul> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
Part 1	What has plan-making / SEA involved up to this point?		<ul> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
Part 2	What are the SEA findings at this current stage?		<ul> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
Part 3	What happens next?		■ A description of the monitoring measures envisaged

#### Table AI.2: Interpretation of the regulations

#### Schedule 2

## The report must include...

## (a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;

- (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- (c) the environmental characteristics of areas likely to be significantly affected;
- (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
- (e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
- (f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
- (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
- (h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
- (i) a description of the measures envisaged concerning monitoring.

#### Interpretation of Schedule 2

#### The report must include...

An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes

i.e. answer - What's the plan seeking to achieve?

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

environmental importance 'context'?

The relevant environmental protection objectives, established at

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'

international or national level

The environmental characteristics of areas likely to be significantly affected

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

i.e. answer - What's the 'baseline'? answer – What's the scope of the SA?

Φį

i.e. answer - What's the

Key environmental problems / issues and objectives that should be a focus of appraisal

i.e. answer - What are the key issues & objectives?

An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)

The likely significant effects associated with alternatives, including on issues such as...

... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan. i.e. answer - What has Planmaking / SA involved up to this point?

[Part 1 of the Report]

The likely significant effects associated with the draft plan

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan

i.e. answer - What are the assessment findings at this current stage?

[Part 2 of the Report]

A description of the measures envisaged concerning monitoring

i.e. answer - What happens next?

[Part 3 of the Report]

Table AI.3: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements are met

#### Regulatory requirement Discussion of how requirement is met A) The Environmental Report must present certain information 1. An outline of the contents, main Chapter 2 ('What is the plan seeking to objectives of the plan or programme, and achieve') presents this information. relationship with other relevant plans and programmes; 2. The relevant aspects of the current state These matters have been considered in of the environment and the likely evolution detail through scoping work, which has thereof without implementation of the plan involved dedicated consultation on a or programme; Scoping Report. The 'SEA framework' – the outcome of 3. The environmental characteristics of scoping – is presented within Chapter 3 areas likely to be significantly affected; ('What is the scope of the SEA?'). 4. Any existing environmental problems More detailed messages, established which are relevant to the plan or through a context and baseline review are programme including, in particular, those also presented in Appendix II. relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.; 5. The environmental protection, The SEA framework is presented within objectives, established at international, Chapter 3 ('What is the scope of the SEA'). Community or national level, which are Also, Appendix II presents key messages relevant to the plan or programme and the from the context review. way those objectives and any With regards to explaining environmental, considerations have been "how...considerations have been taken into taken into account during its preparation; account", Chapter 7 explains 'reasons for supporting the preferred approach', i.e. explains how/ why the preferred approach is justified in light of alternatives assessment. 6. The likely significant effects on the Chapter 6 presents alternatives assessment environment, including on issues such as findings (in relation to housing growth, biodiversity, population, human health, which is a 'stand-out' plan policy area). fauna, flora, soil, water, air, climatic Chapters 9 presents an assessment of the factors, material assets, cultural heritage draft plan. including architectural and archaeological With regards to assessment methodology, heritage, landscape and the Chapter 8 explains the role of the SEA interrelationship between the above framework/scope, and the need to consider factors. (Footnote: These effects should the potential for various effect include secondary, cumulative, synergistic, characteristics/ dimensions. short, medium and long-term permanent and temporary, positive and negative effects); 7. The measures envisaged to prevent, The assessment highlights certain tensions reduce and as fully as possible offset any between competing objectives, which might significant adverse effects on the potentially be actioned when finalising the environment of implementing the plan or plan, and specific recommendations are made in Section 9 and 10. programme;

#### Regulatory requirement Discussion of how requirement is met 8. An outline of the reasons for selecting Chapters 4 and 5 deal with 'Reasons for the alternatives dealt with, and a selecting the alternatives dealt with', in that description of how the assessment was there is an explanation of the reasons for undertaken including any difficulties (such focusing on particular issues and options. as technical deficiencies or lack of know-Also, Chapter 7 sets out reasons for how) encountered in compiling the required information; selecting the preferred option (in-light of alternatives assessment). 9. Description of measures envisaged Chapter 12 presents measures envisaged concerning monitoring in accordance with concerning monitoring. Art. 10; 10. A non-technical summary of the The NTS is provided at the beginning of this information provided under the above Environmental Report. headings B) The Report must be published for consultation alongside the draft plan

Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

At the current time, this Environmental Report is published alongside the 'presubmission' version of the Neighbourhood Plan, with a view to informing Regulation 14 consultation.

#### C) The report must be taken into account, alongside consultation responses, when finalising the plan

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

This Environmental Report, and consultation responses received, will be taken into account when finalising the plan.

## **Appendix II: SEA Scoping Report**

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