

Attn Planning Policy Team
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH

Your Ref:
Our Ref: DJM/1653/Cadishead
Date: 5th Dec 2016

Dear Sirs,

RE: STAGE 1 LOCAL PLAN REVIEW, REGULATION 18 CONSULTATIONS - DEVELOPMENT PLAN REPRESENTATIONS IN RELATION TO LAND ADJOINING WARRINGTON BOROUGH BOUNDARY.

Further to my discussion with Michael Bell (Policy Manager) last week, I write in relation to the Council's Local Plan review. The enclosed comments relate to the land situated east of Glazebrook Lane, Warrington adjacent to the River Glaze as shown on the enclosed plan.

The proposals map viewed in association with the Council's emerging local plan suggests that the land east of Glazebrook Lane (B5212) as identified on the plan shown edged red is currently designated as Greenbelt and is to be retained as such.

In this case, both the emerging Salford Council Local Plan and the AGMA Greater Manchester Spatial Framework (GMSF) are proposing a strategic allocation ref. WG2 for up to 2250 houses and associated developments on land immediately adjacent to the Council's administrative boundary on the east of Glazebrook lane.

The proposed allocation includes the following works:

“Naturalize the Glaze Brook, incorporate full mitigation for any flood risk associated with it, and retain a strategic recreation route alongside it;

Promote walking and cycling through a range of measures, including: a. Enhancing existing and provide new, walking and cycling routes through the site, connecting new housing to local facilities, employment opportunities and the wider pedestrian and cycling network.

Ensure that vehicular access to the site does not compromise the quality of existing residential areas;”

Policy CS5 of the Council's adopted Core Strategy and Chapter 9 of the National Planning Policy Framework (NPPF) relate to development in the Green Belt. Policy CS5 however simply follows national guidance. Whilst paragraph 90 of the National Planning Policy Framework (NPPF) does allow for "*local transport infrastructure which can demonstrate a requirement for a Green Belt location*"; greater certainty would be welcomed.

Taking flood risk mitigation measures as an example, this may well require works to be carried out within the Warrington borough boundary and could include a range of possible engineering or building operations for which express planning permission is required. Additionally, access to the proposed allocation at WG2 appears to be a key constraint which will require further detailed investigations but at present, but none of the necessary works are contemplated by or referred to in Warrington's emerging local plan. Neither has the impact on the pattern of movement of people and vehicles been noted.

We are aware that Council Officers will be meeting with representatives of Salford Council and the GMSF team as part of the duty to co-operate. Ahead of that meeting and before moving on to the next stage of the local plan review, we consider it vitally important that Warrington Council gives more detailed consideration to supporting the spatial planning objectives of the wider region so as to ensure that the green belt designation does not inadvertently prejudice the delivery of major strategic developments and wherever possible supports them.

We encourage explicit consideration of the possible future need to carry out infrastructure works and engineering operations on land within the greenbelt defined by Warrington's Local Plan to facilitate access and support the allocation within the Salford Local Plan and GMSF. Thereafter, we envisage that the text of the emerging local plan could be amended and that a specific SPD or LDO could be adopted and attached to a relevant policy at a later date.

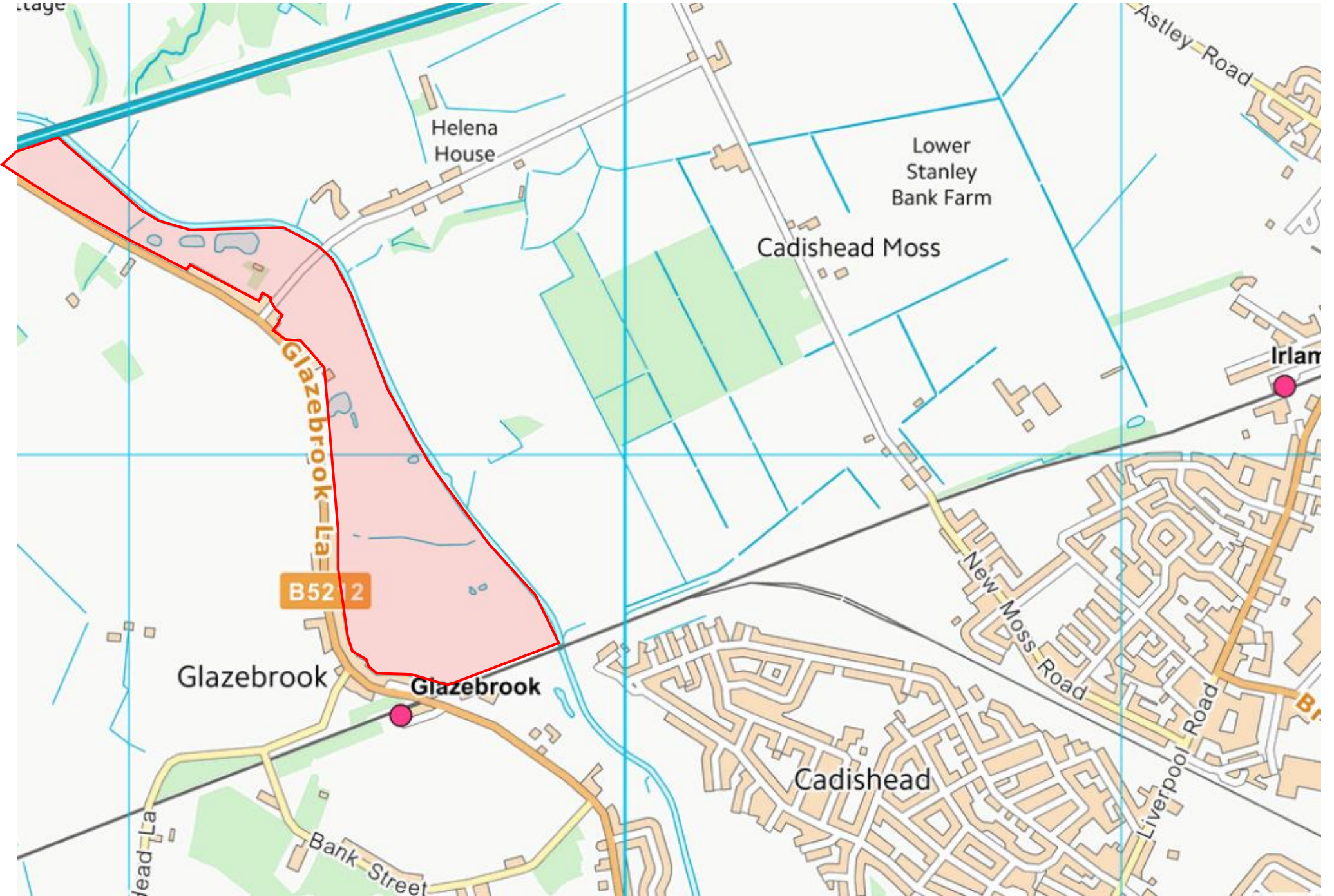
I trust this sets out matters clearly enough, but if there are any questions about this representation, please don't hesitate to contact us.

Yours faithfully



Dan Matthewman LL.B (Hons), MSc, ACILEx, MTRPI
Associate

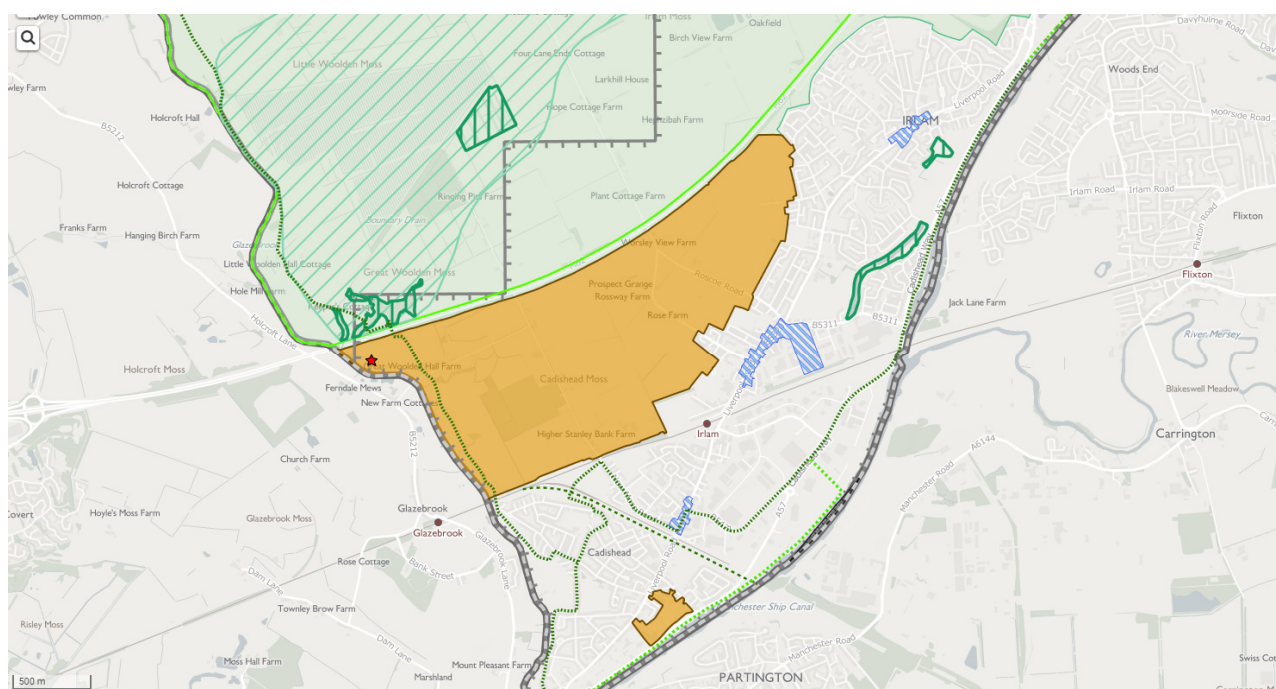
LAND ADJACENT TO GLAZEBROOK LANE, GLAZEBROOK, WARRINGTON.



H3/4 Western Cadishead and Irlam, Cadishead and Irlam

(289.2 hectares)

The area extending west of Irlam, with the M62 motorway to the north, the Irlam rail line to the south and the city boundary to the west, will be developed to provide a high quality extension to the Irlam neighbourhood. Around 2,250 new homes will be constructed by 2035, together with supporting facilities, and the scheme will be characterised by a high level of green infrastructure extending into Chat Moss to the north.



• Chapter 9 Housing

- Housing allocation (Draft local plan policy H3/4)
 - Western Cadishead and Irlam
 - [View this policy in the draft local plan \(opens in a new window\)](#)

• Chapter 13 Accessibility

- Manchester Airport Safeguarding Zone (Draft local plan policy A12(i))
 - [View this policy in the draft local plan \(opens in a new window\)](#)
- Manchester Airport Safeguarding Zone (Draft local plan policy A12(iii))
 - [View this policy in the draft local plan \(opens in a new window\)](#)

• Chapter 17 Heritage

- Scheduled ancient monument (Draft local plan policy HE1/19)
 - Promontory fort
 - [View this policy in the draft local plan \(opens in a new window\)](#)

The development of the site will need to:

1) Provide a broad mix of housing, including:

A) A significant number of affordable homes, equating to around 40% of the total dwellings on the site;

B) Higher value properties to diversify the type of accommodation across the Irlam and Cadishead area;

C) Higher density dwellings close to Irlam station to take advantage of the accessible location; and

D) A significant amount of housing targeted at older people, potentially including a retirement village close to a new local centre;

2) Provide a very large amount of green infrastructure throughout the site, including the protection of New Moss Wood and the retention of landscape features such as mature trees and hedgerows, and create attractive access routes through to Chat Moss to the north;

3) Naturalize the Glaze Brook, incorporate full mitigation for any flood risk associated with it, and retain a strategic recreation route alongside it;

4) Protect and enhance the heritage assets within the site, and their settings, particularly the grade II listed Greater Woollen Hall, the promontory fort to its west, which is a scheduled ancient monument, and the wider archaeological landscape;

5) Include a new, centrally located neighbourhood park and sports pitches to provide a range of facilities for all ages including play areas, multiple sports pitches, other outdoor sports with ancillary facilities (changing rooms and car parking);

6) Provide a small local centre within the site, incorporating a new health centre offering GP and dental services;

7) Promote walking and cycling through a range of measures, including:

A) Enhancing existing, and providing new, walking and cycling routes through the site, connecting new housing to local facilities, employment opportunities and the wider pedestrian and cycling network; and

B) Providing significant cycle parking with any new facilities located within the site, and enhanced cycle parking at Irlam station;

- 8) Ensure that vehicular access to the site does not compromise the quality of existing residential areas;
- 9) Incorporate appropriate noise mitigation along the M62 motorway;
- 10) Integrate existing dwellings and their gardens;
- 11) Set aside land for new schools, both primary and secondary, to serve the additional demand for school places generated by the new homes;
- 12) Minimise the loss of the carbon storage function of the peat and avoid any adverse impacts on the hydrology of Chat Moss, whilst ensuring that there is no potential for future problems of land stability or subsidence;
- 13) Make a significant contribution to the enhancement of Chat Moss in accordance with Policy GI3; and
- 14) Be guided at all phases by a masterplan for the whole site, adopted by the city council and produced through an inclusive community planning process, involving local residents, businesses and the voluntary sector.

Reasoned justification

9.23 The site offers one of a small number of opportunities across Greater Manchester to deliver a large-scale, sustainable urban extension. It is very well-located for accessing a wide range of employment opportunities, with the nearby Irlam station providing easy access to the City Centre and Trafford Park, bus routes to Port Salford and Eccles, and Northbank Industrial Park just to the south of the site. The size of the site provides the potential to deliver a very varied mix of housing, helping to deliver a highly inclusive neighbourhood.

9.24 The large number of new residents will help to support existing shops and services in Irlam and Cadishead, such as the nearby Lower Irlam Local Centre, but it will also be necessary to provide new facilities on site. This will include a small local centre that will help to act as a focus for the new development. The site will be an attractive location for families, and it is anticipated that this will generate an additional demand for school places, at least part of which will need to be accommodated within the site. A significant amount of new recreation space will need to be provided to meet the needs of the new residents, and this should also be accessible to the existing urban area so as to aid community cohesion.

9.25 Most of the site has significant depths of peat across it, which has been degraded due to decades of drainage and agricultural activity. Nevertheless, it still performs an important carbon storage function, and should be retained wherever possible. However, this will need to be balanced against the need to ensure that there is no risk of subsidence for development on the site, or for surrounding infrastructure such as the M62 motorway. Compensation for the loss of the peat, mossland and Green Belt will need to be provided by contributing to the enhancement of Chat Moss as an integrated nature conservation resource with improved public access, which will play an important role in meeting the recreation needs of the development. Water vole and bird surveys will be required prior to any development. There will also be a need to undertake a detailed archaeological desk-based assessment, including aerial photograph analysis, field walking, historic building assessment, and coring/evaluation trenching of the peatlands, leading to further investigations and recording, reflecting the sensitive archaeological landscape.