

## **Record F – Local Plan-Prescribed Bodies’ Responses**

- Prescribed Bodies and Specific Consultation Bodies responses through the Local Plan process to the Local Plan.

**LDF**

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**From:** Correspondence [REDACTED]  
**Sent:** 01 November 2016 11:48  
**To:** LDF  
**Subject:** EHRC-CU08039 Warrington Local Plan Review - Regulation 18 Consultation

Dear Planning Policy Team

**Subject: Warrington Local Plan Review - Regulation 18 Consultation**

Thank you for your email dated 24 October 2016 inviting comments on the proposed scope of the review of Warrington's Local Plan.

The Commission does not have the resources to respond to all consultations, and it is not our practice to respond to consultations on local plans or infrastructure projects unless they raise a clear or significant equality or human rights concern.

Local, Parish and Town Councils and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. We provide advice for public authorities on how to apply the PSED, which is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people. To assist, you will find our technical guidance [here](#).

Yours sincerely

**Peter Stewart**

Correspondence Unit Manager

[REDACTED]

Correspondence Unit | Arndale Centre, Arndale House, Manchester, M4 3AQ



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**From:** LDF [mailto:LDF@warrington.gov.uk]  
**Sent:** 24 October 2016 14:02  
**To:** [REDACTED]  
**Subject:** Warrington Local Plan Review - Regulation 18 Consultation

Dear Sir/Madam

**Warrington Local Plan Review - Regulation 18 Consultation**

Warrington Borough Council is launching a review of its Local Plan to ensure Warrington is able to meet its development needs over the next 20 years.

For the first stage of this process, the Council would like your views on the proposed scope for the review as set out in the 'Local Plan Scope and Contents Document'. At the same time, the Council is inviting landowners, developers, the local community and other stakeholders to put forward sites which they think could contribute to meeting Warrington's development needs over the Plan period.

The Local Plan Scope and Contents Consultation Document and standard response form along with the call for sites form are available on the Council's web site as well as a number of evidence base documents and Sustainability Appraisal Scoping Report. These can be viewed at the website address below.

[https://www.warrington.gov.uk/info/200564/planning\\_policy/2274/local\\_plan\\_review](https://www.warrington.gov.uk/info/200564/planning_policy/2274/local_plan_review)

All documents are also available to view electronically at Local Libraries during normal opening hours.

Alternatively, hard copies of the documents and forms are available to view and complete at the following locations during normal working hours:

- New Town House Reception, Buttermarket Street, Warrington, WA1 2NH
- WBC Contact Centre, 26-30 Horsemarket Street, Warrington, WA1 1XL

Please send your comments and completed standard reply forms to:

By e-mail: [ldf@warrington.gov.uk](mailto:ldf@warrington.gov.uk)

By writing to: Warrington Borough Council, Planning Policy and Programmes, New Town House, Buttermarket Street, Warrington, Cheshire, WA1 2NH.

**Please return your representation(s) to Planning Policy, Warrington Borough Council no later than 5.00pm on Monday 05<sup>th</sup> December 2016.**

If you have any questions regarding the consultation or would like any further information, please contact the Policy and Programmes Team on 01925 442826

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# **Warrington Borough Council**

## **Local Plan Review**

### **Regulation 18 Consultation: Standard Response Form**

**October 2016**

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## 1: Contact Details (Compulsory)

Title:

First Name:

Last Name:

Organisation (if applicable):

Address:

Phone Number:

E-mail:

## 2: Questions

### Question 1

Do you have any comments to make about the Council's evidence base?

### Question 2

Do you consider the assessment of Housing Needs to be appropriate?

### Question 3

Do you consider the assessment of Employment Land Needs to be appropriate?

### Question 4

Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

### Question 5

Do you consider the assessment of Land Supply to be appropriate?

### Question 6

Do you consider that Green Belt land will need to be released to deliver the identified growth?

### Question 7

Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

### Question 8

Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?

### **Question 9**

**Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?**

### **Question 10**

**Do you consider the Sustainability Appraisal Scoping Report to be appropriate?**

### **Question 11**

**Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?**

### **Question 12**

**Do you agree with the assessment of Local Plan Policies at Appendix 1?**

### **Question 13**

**Do you consider the proposed 20 year Local Plan period to be appropriate?**

### **Question 14**

**Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?**

### **3: Responses**

#### **Question 1**

## Question 2

### Question 3

## Question 4

## Question 5

## Question 6

## Question 7

## Question 8

## Question 9

## Question 10

## Question 11

## Question 12

## Question 13

## Question 14



Historic England

By email: [ldf@warrington.gov.uk](mailto:ldf@warrington.gov.uk)

Our ref: PL00044906 /

Your ref: PL00044913

Telephone

Fax 0161 242 1423

Dear Sirs,

## **WARRINGTON LOCAL PLAN REVIEW – REGULATION 18 CONSULTATION**

Thank you for consulting Historic England on the above. This response details the expectations of the Local Plan for Warrington and the historic environment.

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

Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (<http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) may be useful in the production of your Plan.

The future Local Plan for Warrington will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that



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Telephone 0161 242 1416 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.

## Evidence base

A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. The evidence base needs to identify:

- What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities;
- What issues and challenges it is facing and likely to be facing in the future;
- What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area.

When undertaking this exercise, it is important to bear in mind that it is not simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the area and its local distinctiveness and character which can easily be lost. There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being discovered in the future. It may also be necessary to identify heritage assets outside Warrington where there are likely to be setting impacts caused by any development proposals put forward in the area. It is also important to bear in mind that some asset types are not currently well recorded. For example, the Register of Parks and Gardens of Historic Interest in England, is thought to represent only around two thirds of sites potentially deserving inclusion. Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a local list.

Potential sources of evidence include:

- National Heritage List for England
- Historic Environment Record
- Conservation Area Appraisals and Management Plans
- Local Lists
- National and Local Heritage At Risk Registers
- Historic Characterisation Assessments
- World Heritage Site Management Plans
- In house and local knowledge expertise



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Where the evidence base is weak, it may be necessary to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan.

## Spatial Portraits

The Plan should include a proper description and assessment of the historic environment in Warrington and the contribution it makes to the area (NPPF, Paragraph 169). The Plan needs to describe the historical growth of the area and identify its historic environment. It should also clearly identify the different places their character and identity and the contribution it makes to all aspects of life in the area.

## Plan Policies

One of the twelve principal objectives of planning under the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations (NPPF, Paragraph 17). Conservation means maintaining what is important about a place and improving this where it is desirable. It is not a passive exercise. It requires a Plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness.

### Strategic policies

Local Plans should include strategic policies to conserve and enhance the historic environment of the area and to guide how the presumption in favour of sustainable development should be applied locally. It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and any Neighbourhood Plans that come forward are required to be in general conformity with the strategic policies of the Local Plan.

The strategic policies for the historic environment will derive from the overall strategy to deliver conservation and enjoyment of the area's heritage assets for generations to come. These may be policies that concern themselves specifically with the development of types of heritage asset. But delivery of the NPPF objective may also require strategic policies on use, design of new development, transport layout and so on. Indeed every aspect of planning, conceivably can make a contribution to conservation. Plan policies in all topics should be assessed for their impact on the strategic conservation objective.

Conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF objectives. The Plan should also consider the role which the historic environment can play in delivering other planning objectives:



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- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Supporting a prosperous rural economy
- Promoting sustainable transport
- Supporting high quality communication infrastructure
- Delivering a wide choice of high quality homes
- Requiring good design
- Protecting green belt land
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Facilitating the sustainable use of minerals

In formulating the strategy it is advisable and often necessary to consider the following factors:

- How the historic environment can assist in the delivery of the vision and the economic, social and environmental objectives for the plan area;
- How the Plan will address particular issues identified during the development of the evidence base including heritage at risk;
- The interrelationship between the conservation and enhancement of the historic environment and the other Plans policies and objectives;
- The means by which new development in conservation areas and within the setting of heritage assets might enhance or better reveal their significance;
- How local lists might assist in identifying and managing the conservation on non-designated heritage assets;
- How the archaeology of the Plan area might be managed;
- How CIL funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified;
- Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed;
- What implementation partners need to be identified in order to deliver the positive strategy;
- What indicators should be used to monitor the effectiveness of the strategy.

#### Development Management Policies

In terms of development management policies, it is clear that the NPPF expects plans to include detailed policies, which will enable a decision maker to determine a planning application.



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The Local Plan should include specific policies for the historic environment in order to help inform decisions that affect it and others should where possible cross-reference heritage related issues.

Key issues to be considered are (not wholly comprehensive):

- Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc).
- Designated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc).
- Archaeology including remains of less than national importance.
- Conservation areas
- Registered parks and gardens
- Heritage at Risk
- Important views and vistas
- Landscape character
- Local character and distinctiveness
- Individual settlements
- Historic shopfronts and advertisements
- Public realm
- Design
- Information to accompany an application.

#### Strategic Cross Boundary Issues

Strategic cross boundary issues that affect the historic environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues listed below, this is not an exclusive list and strategic issues will have to be considered on an area by area basis.

- extensive designated and non-designated heritage assets, e.g. World Heritage Sites, historic landscapes,
- major heritage based tourism attractions, the management of which may impact upon more than one Authority
- major quarries for building and roofing stone, e.g. Portland stone
- major changes to green belt which affect the preservation of the setting and character of historic towns
- major development proposals likely to affect important heritage assets in a neighbouring authority, e.g. major urban extensions, infrastructure proposals

These strategic issues will not necessarily and always be the same as the strategic policies for the protection and enhancement of the historic environment included in a Plan but are likely to be a sub-set of them. Indeed local circumstances may indicate that strategic approaches



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may not always be needed. The sustainability appraisal scoping report should help to identify what is important for a particular plan area.

## Site Allocations

Historic England has produced an advice note – Site Allocations and the Historic Environment in Local Plans (<http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) which may be of help in the production of your Plan. This document is intended to offer advice to all those involved in the process, to help ensure that the historic environment plays a positive role in allocating sites for development. It offers advice on evidence gathering and site allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.

The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that it is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.

Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate:

1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution.
2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets.
3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level.
4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset?



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The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.

The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.

Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.

Historic England strongly advises that you engage conservation, archaeology and urban design colleagues to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the strategic policies, development management policies, in the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. This will ensure that there is joined up and robust approach is undertaken to historic environment issues.

If you have any queries about the content of this letter or would like a meeting to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



**Emily Hrycan**  
Historic Environment Planning Adviser (North West)  
Historic England  
Telephone: 0161 242 1423  
e-mail: [emily.hrycan@HistoricEngland.org.uk](mailto:emily.hrycan@HistoricEngland.org.uk)



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18 November 2016

Dear Sir / Madam

**Warrington Borough Council: Local Plan Review Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood  
Consultant Town Planner

[n.grid@amecfw.com](mailto:n.grid@amecfw.com)

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Gables House  
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National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Yours faithfully

[via email]

**Robert Deanwood  
Consultant Town Planner**

cc. Spencer Jefferies, National Grid

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████████████████████  
██████████  
Planning Policy & Programmes,  
Warrington Borough Council,  
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[www.cheshireeast.gov.uk](http://www.cheshireeast.gov.uk)

**VIA E-MAIL:** ldf@warrington.gov.uk

Our ref: AF/SP7/Fii  
Date: 1 December 2016

Dear Mr Bell,

## **WARRINGTON LOCAL PLAN REVIEW – REGULATION 18 CONSULTATION**

Further to the above, thank you for the opportunity to comment on the Warrington Local Plan Review.

Please find below Officer comments, relating to some of the specific consultation questions:

***Question 9: Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review? -***

Cheshire East Council considers that such matters are appropriate for inclusion within the Warrington Local Plan Review, enabling a comprehensive review of Policy to take place. It should be noted that Warrington Borough Council do not propose an alternative way of dealing with these matters, if they are not included within the Warrington Local Plan Review.

***Question 13: Do you consider the proposed 20 year Local Plan period to be appropriate?*** Cheshire East Council agrees that this is an appropriate time period for the Local Plan to cover and is consistent with national guidance.

***Question 14: Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?*** It is noted that the OAN identifies a need for 839 new homes per year, along with an additional 62 bed spaces in Care Homes per year up to 2037 and that to ensure a balance between homes and jobs Warrington Borough Council consider that it will be necessary to increase the minimum supply of homes to around 1,000 per annum. In addition, the EDNA has identified an OAN figure of 381 hectares of employment land over the next 21 years. Cheshire East Council urges Warrington Borough Council to identify sufficient development sites, to

meet these housing and employment land requirements, in its Preferred Option' consultation draft Local Plan.

I trust that these comments will be taken into account, as part of your consultation.

In addition, Officers have a number of technical points that they would like the opportunity to discuss further and I therefore request a Duty to Co-operate meeting; the technical points relate to the following topic areas:

- Jobs growth;
- Commuting and migration flows;
- Affordable housing and market signals;
- Functional Economic Market Area;
- Assessment of housing needs;
- Estimation of employment land need.

I look forward to hearing from you.

Yours sincerely



**Adrian Fisher**  
**Head of Planning Strategy**

Emerson House  
Albert Street  
Eccles  
Salford  
M30 0TE

Warrington Borough Council,  
Planning Policy and Programmes,  
New Town House,  
Buttermarket Street,  
Warrington,  
Cheshire, WA1 2NH.

5<sup>th</sup> December 2016

Dear Planning Policy Team,

**RE: Local Plan review: Scope and Contents Consultation**

I am writing regarding the above consultation. The comments here relate only to Minerals and Waste aspects of the consultation document and as such, I have provided a response to Question 9 only.

**Question 9**

**Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?**

The Minerals and Waste Planning Unit work on behalf of AGMA to represent the authorities on minerals and waste planning issues, as such I am preparing this response on their behalf.

We consider that Minerals and Waste need to be included in the scope of the proposed Local Plan review to ensure it meets the requirements of NPPF, NPPW and the Waste Framework Directive.

**Minerals**

Paragraphs 142 – 149 of NPPF set out the Government's approach to minerals planning and how Mineral Planning Authorities (MPA), such as Warrington BC, are expected to plan for minerals. NPPF requires MPAs, in their Local Plans, to identify potential future minerals sites, and safeguard minerals and minerals infrastructure from encroachment by non-minerals development. They are also required to set out the criteria against which applications for minerals development will be assessed.

Minerals will play a vital role in meeting the need for additional housing and other development in Warrington and it is therefore important that they are planned for adequately.

It is understood that the borough previously intended to prepare minerals policies in a separate plan. However given the requirements of NPPF and the importance of minerals when planning for growth, we consider it appropriate to include minerals in the Local Plan Review. This will help to ensure Warrington meets its obligations in terms of minerals which will help the borough to achieve a sound Plan.

## **Waste**

The Government's stance on waste planning is set out in National Planning Policy for Waste (NPPW). NPPW requires Waste Planning Authorities (WPA), such as Warrington BC, identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The Waste Framework Directive, which has been transposed into UK law, requires authorities to ensure waste is managed in line with the 'Waste Hierarchy'.

It is therefore important that waste is planned for adequately in Warrington, particularly given the level of growth expected.

It is understood that the borough previously intended to prepare waste policies in a separate plan. However given the requirements of NPPW and the Waste Framework Directive, we consider it appropriate to include minerals in the Local Plan Review. This will help to ensure Warrington meets its obligations in terms of waste which will help the borough to achieve a sound Plan.

I hope our comments are of use to you and if you wish to discuss these further, please contact me using the details at the bottom of this letter.

Yours sincerely,

Carolyn Williams (Group Leader Waste and Minerals Planning, AGMA)

Minerals & Waste Planning Unit  
Urban Vision Partnership Ltd  
5th Floor  
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Albert Street  
Eccles  
M30 0TE





Date 5<sup>th</sup> December 2016

**By E-Mail and Post**

Warrington Borough Council  
Planning Policy and Programmes  
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Buttermarket Street  
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WA1 2NH

Dear Sirs

**RE: WARRINGTON BOROUGH COUNCIL LOCAL PLAN REVIEW STAGE 18 CONSULTATION**

Thank you for the opportunity to comment on the proposed scope of the review to the Warrington Local Plan, as set out in the regulation 18 Scope and Contents Document dated October 2016.

The LEP response is guided by our role: to set the sub-regional economic strategy for Cheshire and Warrington. We are currently embarking on a review of our Strategic Economic Plan (SEP), updating the current plan 'Cheshire and Warrington Matters' which was first published in 2014. One of the principle drivers for the refresh is the decision to revise our economic growth ambitions following discussions with Government on a potential devolution deal. These discussions led the Cheshire and Warrington local authorities and the LEP to conclude that by 2040 we could deliver:

- A £50 billion GVA per year economy
- 139,000 new homes
- 127,000 new jobs

The LEP is supportive of Warrington's decision to review its Local Plan and the consultation process associated with it. The proposed scope appears reasonable and well thought out and offers the Council an opportunity to set out the Borough's role in meeting these ambitions.

We note that you propose that the scope of the review should focus on three identified strategic matters: -

- The provision of land and level of housing development that can be accommodated within Warrington, taking into account Objectively Assessed Needs (OAN);
- The provision of land for economic development and a growing local economy, taking in to account Objectively Assessed Needs (OAN); and

**RICHMOND HOUSE, GADBROOK BUSINESS PARK, RUDHEATH, NORTHWICH, CW9 7TN**



- Ensuring the timely delivery of new and improved physical and social infrastructure required to meet the needs of new development and mitigate the impacts on existing communities

We also note your proposals to review the current Green Belt including safeguarding Green Belt land for future longer term development beyond the current plan period.

In addition, we acknowledge that the review provides an opportunity to consider needs in relation to Minerals and Waste and Gypsy and Traveller Needs.

### **Evidence Base**

The revised housing and employment figures set out in the more detailed documents as part of the review evidence base are in line with the ambitions set out in the current devolution proposals and framework for the review of the SEP.

At this stage we are not in a position to identify any additional evidence requirements beyond those already included on the Local Plan Review Page.

Yours sincerely

**Philip Cox**  
Chief Executive, Cheshire and Warrington LEP

Warrington Borough Council Local Plan Review

Regulation 18 Consultation Response

Sport England (October 2016)

Miss Fiona Pudge

Sport Park, 3 Oakwood Drive, Loughborough, Leicestershire, LE11 3QF

**Question 1: Do you have any comments to make about the Council's evidence base?**

Evidence base - Open Space Audit 2015

It is noted local standards for outdoor sports have been produced. Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full sized adult rugby pitch. In addition the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

The Council is currently undertaking a Playing Pitch Strategy (PPS) which should be used as the evidence base to inform sport related policy to protect, enhance and provide. Sport England forms part of the PPS Steering Group and is working with the Council to identify a hierarchy of sites to protect and enhance and if feasible allocation of new sites.

Sport England is working with the Council to assess what the additional demand from population and housing growth will be and what the impact on existing playing field will be. A Developer Contributions Process using information set out in the PPS will be developed to help establish:

- what the additional demand for sport will be from individual or cumulative housing sites,
- which existing sites need to be improved to increase capacity to take the additional demand; and
- what an appropriate developer contribution should be

Sport England would wish to see the Playing Pitch Strategy, which the Council has committed to monitoring and reviewing annually as the appropriate evidence base to support the Local Plan.

Sports Facilities Needs Assessment 2015 - although there is a reference to this on the Council's website there is no link to the document. Having spoken to Planning Policy it would appear this provides an audit but no information on how it can inform planning policy to protect, enhance, and provide indoor sports facilities.

**Question 7: Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?**

Sport England would wish to see a review of the Sport and Physical Activity section given the change in Government thinking and the emergence of DCMS Strategy "Sporting Future: A New Strategy for an Active Nation". In response to this strategy Sport England has published 'Towards an Active Nation' which sets out how Sport England will work in partnership with a range of organisations, including Local Planning Authorities, to implement the Strategy.

<https://www.sportengland.org/news-and-features/news/2016/may/19/sport-england-triples-investment-in-tackling-inactivity/>

Sport England and Public Health England has prepared guidance called 'Active Design' which helps planners, developers and suchlike to incorporate key principles into new development which creates physical activity opportunities. The guidance can be found using this link:

<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

The Local Plan review should reflect the new strategies within the Health and Well-Being chapter and use the emerging sport related evidence base to help inform revised policies.

**Question 12: Do you agree with the assessment of Local Plan Policies at Appendix 1?**

Yes but would like to suggest the following amendments:

Policy PV 7 - Promoting the Visitor Economy: suggest expanding this to specifically include visitors to sports venues e.g. Halliwell Jones Stadium (Rugby League) and Warrington Town FC.

Reason: Sports clubs contribute to the economy whether they are grassroots or premier/superleague. Research carried out by Sport England 'Economic Value of Sport'

(2013) shows that sport contributed £20.3 billion GVA and was 14th in the Industry Sector League Table ahead of telecoms and architectural and engineering services. There is also a clear link to the health agenda with sport representing £11.2billion towards health. To

provide evidence of the value of sport to Warrington, Sport England has produced a tool called 'Economic Value of Sport - Local Model (Updated 2015)'. This can be accessed via the Research page of Sport England's website.

Policy SN 7 - Enhancing Health and Well-Being: expand both the policy and the reasoned justification to reflect the Government and Sport England's Strategies to increase physical activity by promoting flexible indoor and outdoor venues. Innovative solutions to promote physical activity in non-traditional sports venues should be encouraged, whilst recognising that traditional sport also plays an important role in health and well-being.

Policy MP 3 - Active Travel: strengthen this policy to include physical activity opportunities within the design of new developments. Sport England has produced guidance in partnership with Public Health England that sets out ten principles to incorporate into design to promote physical activity. The Active Design Guidance can be found on Sport England's website.

**Question 13: Do you consider the proposed 20 year Local Plan period to be appropriate?**

Yes - the emerging Playing Pitch Strategy forecasts the additional demand generated from housing growth over the next 20 years.

**Question 14: Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?**

See answer to question 7.



Therefore, Cheshire West and Chester Council agrees that the three strategic matters identified as initial focus of the Local Plan review are the most appropriate, given that they broadly relate to those already identified through previous co-operation and consultation.

Cheshire West and Chester is identified as part of a self-contained local housing market area, separate from Warrington, although it is recognised that there are movements between the two authorities. This was confirmed in the Local Plan (Part One), which sets out the levels and location of new development that is required to meet Cheshire West and Chester's objectively assessed need, and to achieve the planned growth in Cheshire West an increase in labour supply of 17,000 people is required.

It is noted that the Warrington Local Plan Review is focused on the provision of land to meet Warrington's objectively assessed need for housing and for economic development and a growing local economy. Most, if not all, adjoining authorities will also be planning positively for economic growth which will require the retention and attraction of working age people. The National Planning Policy Framework is very clear that Local Plans should aspirational but realistic and it follows that the implications for growth should be modelled and similarly tested (para 154).

### Economic Development Needs Assessment

The 'Economic Development Needs Assessment' (EDNA) produced by BE Group identifies Cheshire West and Chester as being within the Functional Economic Area (FEMA) for Warrington. Cheshire West and Chester is listed as having been consulted on the development of the document. However, Planning and Strategic Transport have no record of having been consulted, and it would be very helpful if Warrington Borough Council could identify the relevant officer who was consulted and provide a copy of any response that was made. It is not clear how the conclusion has been reached that the FEMA extends to the whole of Cheshire West and Chester, along with a number of other authorities.

The definition of the FEMA could have implications for the justification of the use of Green Belt land, although we agree with the section of the EDNA which recognises that there are well-established, separate, Housing Market Areas for Cheshire West and for Warrington; and that the strongest commercial property market linkages are found between Warrington and Halton and not with Cheshire West.

As such, we would welcome further discussion on the EDNA and site identification, through the Duty to Cooperate process, as the Warrington Local Plan Review progresses.

The study identifies the Manchester Ship Canal as a key asset and promotes the expansion of Port Warrington. It is essential that any expansion of the port or intensification of operations is the subject of consultation with neighbouring authorities that could be effected, for example, through an increase in shipping movements on the ship canal or where there is the potential for impact on designated European sites which are located outside of the Warrington authority area.

Table ES2 states for the M56 corridor that '*Stakeholders showed strong support for the provision of a new strategic site(s) along the M56 corridor...*' and a '*A sub-set of the general need, focused on the Manchester Ship Canal and Port Warrington*'. It would be helpful to

understand which stakeholders these statements refer to. This should also be viewed in the context of the general need along the Manchester Ship Canal, including implications for other sites identified in the Draft Mersey Ports Masterplan (for example Port Cheshire and Port Ince).

There are also several specific factual errors in the study at the following paragraphs:

- 7.26 – our Local Plan requirement is for ‘at least’ 365 ha employment land and as such is not a maximum figure.
- 7.27 – note there are some updates to Cheshire West and Chester’s ELSU in the Draft HELAA (August 2016) that was available for consultation alongside the Local Plan (part Two) Preferred Approach.
- 7.28 – 182.26 ha relates to the realistic employment land supply in Ellesmere Port; 55.55 ha is identified at Ince Park and land to the east of Ince Park – considerably less than ‘around a half’ as stated in the study.
- 7.29 – Thornton is a major research and innovation campus for the University of Chester, with the aim of facilitating new business start-ups and the expansion of businesses operating in the energy, environment, engineering, advanced manufacturing, chemicals and automotive sectors – and is not primarily focused on energy generation.
- 7.31 – within the Cheshire West and Chester Local Plan period to 2030, we would not be looking to Flintshire to meet any of our employment land needs.
- 7.32 – reference to ‘*the Local Plan Part Two will consider growth options delivering up to 40 ha of additional land in both towns*’ is incorrect – the Local Plan (Part One) makes provision for ‘at least’ an additional 30 ha employment land for Northwich and at least 35ha in Winsford (subsequently identified through the Winsford Neighbourhood Plan).

#### Review of Economic Forecasts and Housing Numbers (October, 2016)

As regards the range of objectively assessed need identified in the ‘Review of Economic Forecasts and Housing Numbers’, Cheshire West and Chester Council would support the adoption of a figure that meets the needs of the Warrington’s local population, based on national population projections, including an additional uplift for market signals and affordable housing – which would be appropriate and in line with national guidance.

However, Cheshire West and Chester Council would have concerns about the implications of the adoption of any higher growth scenario that would require a significant increase in net migration, which could impact surrounding authorities with their own growth and regeneration aspirations, or result in unsustainable cross boundary commuting patterns.

Table A1 shows housing completions data for Warrington and neighbouring authorities based on DCLG live table 253. Appendix 1 states that Warrington believes their own figures to be more accurate than DCLG data, which is based on building control records. This is the same for Cheshire West and Chester, where the DCLG returns are much lower than actual completions, and therefore, we would suggest that this is updated with the latest completions data from our Housing Land Monitor.

Furthermore, text on p.3 states that there are only 10 DCLG records, over the last 14 years, covering 8 authorities, which exceed 1,000 dwellings per annum. As outlined in the previous paragraph, this is probably a significant under-estimation of housing delivery in the sub-region, as Cheshire West and Chester alone has completed more than 1,000 dwellings on 7 occasions (gross) (and 6 occasions net) over the last 14 years. The analysis should therefore be amended to use actual completions data and to also clarify if it is referring to the gross or net figure.

Mid-Mersey Strategic Housing Market Assessment – Addendum for Warrington (October, 2016)

While the 'Mid-Mersey Strategic Housing Market Assessment – Addendum for Warrington' assumes that Warrington's commuting ratio will remain the same, if Warrington were to plan for growth that both increased migration and commuting from Cheshire West, this could have the potential to undermine the delivery of the Cheshire West and Chester Local Plan. Are the higher growth scenario figures set out achievable and it realistic to assume that commuting patterns will remain unchanged?

Minerals and Waste and Gypsy and Traveller needs

Cheshire West and Chester Council consider that it is appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Warrington Local Plan review.

In conclusion, Cheshire West and Chester Council supports Warrington's plan to provide the right amount of housing development to meet its own local needs, providing this does not lead to unsustainable travel/ commuting patterns. However, if a higher growth scenario was considered achievable and translated into a higher housing requirement for Warrington, then this would potentially have strategic implications for neighbouring authorities.

At this stage, these are officer level comments and we would welcome the opportunity, going forward, to cooperate further with you in the development of our Local Plan (Part Two) and Warrington's Local Plan Review.

Yours sincerely

**Mrs Fiona Hore**  
*Senior Manager – Planning and Strategic Transport*  
*Places Strategy*  
**Cheshire West and Chester Council**

## LDF

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**From:** Gaskell, Gemma [REDACTED]  
**Sent:** 05 December 2016 16:00  
**To:** LDF  
**Cc:** Pemberton, Rebecca  
**Subject:** Warrington Local Plan Review - Regulation 18 Consultation (Our ref. DC/16/4503)

Dear Sir / Madam

Thank you for consulting United Utilities on the Warrington Local Plan Review – Regulation 18 Consultation. We have reviewed the document and would like to take the opportunity to make you aware of a number of constraints within your local authority boundary, which will need to be afforded due regard in the future allocation of sites.

I note that your consultation document states that *the current Local Plan was prepared to facilitate a much lower level of development which could be accommodated without the need for any release of Green Belt. This is no longer consistent with Warrington's identified development needs...To ensure enough land is available to meet the identified development needs across and beyond the Plan period, the Council is also conducting a 'call for sites' (including Green Belt sites). The Council will invite land owners, developers, the local community and other stakeholders to put forward sites for consideration as part of the Plan review.*

When assessing sites put forward as part of this 'call for sites' exercise it is important to be aware of the following:

### **Groundwater Source Protection Zones (SPZ's)**

There are a number of groundwater SPZ's within Warrington Council boundaries. SPZ's identify the groundwater catchment areas of sources of potable water (that is high quality water supplies usable for human consumption) and show where they may be at particular risk from polluting activities on or below the land surface. The prevention of pollution to drinking water supplies is critical.

The aim should be to avoid siting potentially damaging activities in the most sensitive locations from a groundwater protection viewpoint. Groundwater SPZ's show where there may be a particular risk from polluting activities on or below the land surface to the water abstraction.

We have assessed the submissions to the previous SHLAA (January 2016), and the following sites are:

- a) Situated within groundwater SPZ1 (inner zone – closest to the water abstraction point)

<b>SHLAA_Ref</b>	<b>Site_Name</b>
1588	Heath House, Kenyon Lane, Croft
2454	Garden of 17 Golborne Road, Winwick
2652	42 Rectory Lane, Lymm
2670	Highfield Farm, Waterworks Lane

- b) Situated within groundwater SPZ2 (outer zone)

<b>SHLAA_Ref</b>	<b>Site_Name</b>
1058	Former Sewage Works
1415	Aston Berkeley Systems Ltd,
1504	Land off Thirlmere Drive
1528	Land adjacent to and west of Statham Community Primary School
1545	Rushgreen Rd, Lymm
1557	Large field to the east and south of Reddish Lane
1558	Field to the west of Reddish Lane
1565	Land west of Reddish Crescent, Lymm

1588	Heath House, Kenyon Lane, Croft
1607	The Old Rectory
1611	Land to the east of Walton Lea Road, Higher Walton
1638	Broomedge Nurseries (formerly Hampson Nursery)
1720	MSBS Joinery Site
1806	Land adj to 220 Stone Pitt Lane
1838	Northway lock up garages
1888	Land at Sutch Lane
2138	Land to the rear of Nos. 8 and 9 Oak Road
2139	20 Bridgewater Street, Lymm
2140	Whitbarrow Road
2161	Land to the west of Oughtrington Lane, South of the Bridgewater Canal
2179	Land off Hardy Road
2190	Lymm Youth Club
2244	Land between Underbridge Lane and Chester Road
2439	71, Statham Avenue
2454	Garden of 17 Golborne Road, Winwick
2456	Whispers, Green Lane
2509	56a, Higher Lane
2521	Land to the rear of The Foxes
2609	Land to rear of 18 Booths Lane, Lymm
2615	Barn at 57 Cherry Lane, Lymm
2629	Dennow Cottage, Firs Lane, Appleton
2650	46 Barsbank Lane, Lymm
2652	42 Rectory Lane, Lymm
2670	Highfield Farm, Waterworks Lane
2671	Land south of Chester Road, Walton
2229	57 Cherry Lane, Lymm, Warrington, WA13 ONU
2705	Land at Cherry Lane
2708	Barrow Farm
2710	Land to the West of Higher Walton
2900	Land adj to Cherry Lane Barns
2829	Stable / Laundry Outbuilding at Lymm Hall
2865	8, Grammar School Road
2879	Units 1 & 2
2709	Land North West of Croft (part covered by 2156)

The call for sites exercise carried out as part of the Local Plan Review is likely to identify further sites within these groundwater source protection zones.

When assessing proposals for development within this area, I would urge you to refer to the document 'Environment Agency Groundwater protection: Principles and practice (GP3)' to ensure any impact of development on groundwater quality in the area is best managed. The document encourages planners, developers and operators to consider the groundwater protection hierarchy in their strategic plans and when proposing new development.

### **Wastewater Treatment Works (WwTW)**

When considering the suitability of each of the sites you receive as part of the Call for Sites exercises, I would urge you to consider proximity to existing United Utilities Wastewater Treatment Works (WwTW). It is important to explain that wastewater treatment works can result in emissions which include odour and noise. It is possible that new sites could introduce new receptors closer to the treatment works. Our position is that it is more appropriate not to introduce new additional sensitive receptors near to an existing treatment works. If, however, you are assessing the suitability of sites near to existing wastewater treatment works, we would welcome the opportunity to discuss the sites in further detail to ensure appropriate assessment.

We have assessed the submissions to the previous SHLAA (January 2016), and the following sites are situated within close proximity to an existing WwTW:

SHLAA_Ref	Site_Name
1554	Land at Glazebury WwTW
1567	Land at Warrington Road / Hawthorne Avenue, Culcheth
1633	Arpley Meadows (most western parcel)
2273	Motortrade
2599	Port Warrington East (Phase 2)
2643	375 Old Liverpool Road
2710	Land to the West of Higher Walton
15631	Land off Eastford Road

The call for sites exercise carried out as part of the Local Plan Review may identify further sites within close proximity to WwTW.

### Pre-development Enquiry

United Utilities has a free pre-application service available to discuss options on potential development land. We would encourage this to take place at the earliest opportunity. Our contact details for this are:

Wastewater Developer Services

Tel: 03456 723 723

Email: [WastewaterDeveloperServices@uuplc.co.uk](mailto:WastewaterDeveloperServices@uuplc.co.uk)

Water Developer Services

Email: [DeveloperServicesWater@uuplc.co.uk](mailto:DeveloperServicesWater@uuplc.co.uk)

Telephone: 0345 072 6067

Website: <http://www.unitedutilities.com/builders-developers.aspx>

I hope the above information is useful. If you have any questions at all, don't hesitate to contact me. I would be grateful if you could continue to keep United Utilities informed of your Local Plan Review, along with any other development plan consultations.

Best regards

### Gemma Gaskell

Developer Services and Planning

Operational Services

United Utilities

[Redacted]

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[Redacted signature block]



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Date: 5<sup>th</sup> December 2016  
Our ref: 199598  
Your ref: Warrington Local Plan Review - Regulation 18 Consultation



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Dear Sir/Madam

**Warrington Local Plan Review - Regulation 18 Consultation**

Thank you for your consultation on the above application, which was received by Natural England on 24th October 2016.

**Local Plan Review**

Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development.

Local authorities should ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider environment, and maximise opportunities to include geodiversity in and around developments as part of the design process. Further information on geodiversity is available on Natural England's website.

Warrington's natural assets need to be protected, conserved and enhanced and that this

should be a key issue in the Local Plan review. Natural England would expect biodiversity and geodiversity, soils, priority habitats, ecological networks, protected species to be covered under the heading of the natural environment. Please see the appendix below for further information on these topics.

### **Sustainability Appraisal Scoping**

Natural England welcome the inclusion of Sustainability Appraisal (SA) Objective *Protect and enhance biodiversity and geodiversity* but suggests it is broadened to include maintain habitats and biodiversity, as the plan should continue to strengthen their conservation and encourage their enhancement in new development. The potential negative impacts of increased access on sensitive habitats, including designated sites, should be recognised. The pressures of increased access associated with development should be recognised and mitigation recommendations identified.

In accordance with the Environment White Paper *The Natural Choice – making space for nature*, the Biodiversity 2020 strategy and the NPPF, objectives should go beyond safeguarding biodiversity. The SA should ensure that policies within the merging plan conserve and enhance the natural environment to ensure there is a net gain in biodiversity. Merely safeguarding biodiversity would not achieve this national objective.

The SA should reflect the importance of geodiversity as well as biodiversity to ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider. Further information on geodiversity is available on Natural England's website.

The objectives should ensure the sustainable use of natural resources, including soils and geodiversity. Soils form the thin layer of our geodiversity, linking the underlying geology with the land surface and atmosphere. Therefore it is important to make the link between geodiversity, biodiversity and soil resources. Further guidance on soils, including links to important publications such as 'Safeguarding our soils: A strategy for England' (Defra, 2009) can be found on Natural England website. Important soil resources should be protected (e.g. best and most versatile (BMV) agricultural land) and appropriate management and handling of soils during the development process is essential. 'Safeguarding our soils' provides a clear vision in relation to development and soils – we should 'prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve our understanding of the threats to soil and best practice in responding to them.'

There needs to be recognition of the requirements of the NPPF, including the need to protect and enhance biodiversity, including designated sites, landscape and open space, water quality, air quality and to address climate change. The NPPF also includes requirements to protect and enhance public access and best and most versatile soils.

### **Monitoring and Indicators**

As set out in [Planning Practice Guidance](#), you should be monitoring the significant environmental effects of implementing the plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Landscape:

- Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.

Green infrastructure:

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Kate Wheeler  
Lead Advisor  
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

## **APPENDIX - Additional Information**

### **Designated sites**

The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

The Local Plan should be screened under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

The Magic website is a useful source of information on the location and qualifying features of the international and national designations. Natural England's Impact Risk Zones, relating to designated sites, is another useful tool to identify risks associated with different types of development. Natural England has also produced Site Improvement Plans (here) for European sites which provide an overview of the issues affecting the condition of the site(s) and outlines the priority measures required to improve the condition of the features. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites.

### **Landscapes**

Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria based policies to guide development, as set out in the National Planning Policy Framework (NPPF), The Local Plan's policies and proposals should be informed by National Character Areas (NCAs). These should be supplemented by a more detailed Landscape Character Assessment (LCA) of the plan area. Such assessments can assist in the selection of locations for development which involve the least harm to landscape character and guide policies on the design of development.

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 123 of the NPPF. Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available here and are a helpful source of evidence for the Local Plan and SEA/SA.

### **Biodiversity and Geodiversity**

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). New development should incorporate opportunities to enhance biodiversity, wherever possible.

The Local Plan should be underpinned by up to date environmental evidence, this should include an assessment of existing and potential components of ecological networks and this will require working with Local Nature Partnerships, as recommended by paragraph 165 of the NPPF.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here [UK BAP priority species and habitats](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.

Where a plan area contains irreplaceable habitats, such as ancient woodland and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland and veteran trees.

### **Green Infrastructure**

GI refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure networks should support a similar approach for ecological networks, as outlined above. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included within a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs. Natural England's Accessible Natural Greenspace Standard (ANGSt) provides a useful indicator in assessing current level of accessible natural greenspace and planning improved provision.

### **Soils**

These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.

To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraph 112 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the [www.magic.gov.uk](http://www.magic.gov.uk) website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform plan making. New ALC surveys may be required for sites allocated in the plan.

Climate change and flood risk

The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. GI and resilient ecological networks play an important role in aiding climate change adaptation.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

The NPPG provides further guidance on information sources for the water environment which should be used to inform the Local Plan and the SA/SEA.

### **Water Quality**

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 156 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 100-104 of the NPPF.

The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on N2K sites, SSSIs and local sites which contribute to a wider ecological network.

### **Air pollution**

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air

Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic. which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.

**From:** Stakeholder (MMO) [REDACTED]  
**Sent:** 25 October 2016 16:49  
**To:** LDF  
**Subject:** RE: Warrington Local Plan Review - Regulation 18 Consultation

Thank you for including the MMO in your recent consultation submission. Please remove [stakeholder@marinemanagement.org.uk](mailto:stakeholder@marinemanagement.org.uk) from your database and address further communications to [consultations.mmo@marinemanagement.org.uk](mailto:consultations.mmo@marinemanagement.org.uk) .

The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

### **Response to your consultation**

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

### **Marine Licensing**

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

### **Marine Planning**

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the [East Inshore and Offshore marine plans](#) were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our [Marine Information System](#). The MMO is currently in the process of developing marine plans for the South

Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

### **Minerals and waste plans and local aggregate assessments**

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at [consultations@marinemanagement.org.uk](mailto:consultations@marinemanagement.org.uk) or telephone us on 0300 123 1032.

Kind regards,

Her Majesty's Government – Marine Management Organisation  
Lancaster House, Hampshire Court, Newcastle upon Tyne, NE4 7YH  
Tel: 0300 123 1032  
Fax: 0191 376 2681  
Web: [www.gov.uk/mmo](http://www.gov.uk/mmo)  
Twitter: [@the\\_MMO](#)  
Facebook: [/MarineManagementOrganisation](#)

Enabling sustainable growth in our marine area

[Redacted text block]

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### The Marine Management Organisation (MMO)

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# TRAFFORD COUNCIL

Warrington Borough Council  
Planning Policy and Programmes  
New Town House  
Buttermarket Street  
WARRINGTON  
WA1 2NH

**Clare Taylor-Russell**  
Strategic Planning and Growth Manager

**Trafford Council**  
1st Floor, Trafford Town Hall, Talbot Road  
Stretford, Manchester M32 0TH  
**Email** [strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)  
**Telephone** 0161 912 3149  
[www.trafford.gov.uk](http://www.trafford.gov.uk)

**Date** 9 December 2016

**Your ref:** SP&G / PL

Dear Sir / Madam,

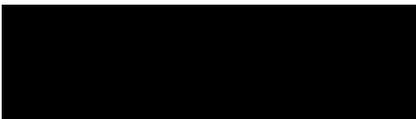
Thank you for notifying Trafford Council as a specific consultation body to the Warrington Local Plan Review, as an area that adjoins Warrington's local planning authority area. Trafford Council welcomes the opportunity to comment on the Regulation 18 Stage 1 Plan Consultation (Scope and contents) in terms of what a local plan ought to consider and the proposed scope of the review.

Having reviewed the documents, Trafford Council does not have any specific comments to make at this stage of the review process. However, Trafford Council would welcome the opportunity to work with Warrington Borough Council in the future to ensure that the Warrington Local Plan is complementary to both the Greater Manchester Spatial Framework (GMSF) and the Trafford Local Plan.

In particular, it will be important for our local authorities, and Salford, to work together in relation to one of the GMSF's most significant proposals, The Western Gateway Strategic location (Policy SL5). This is identified as a nationally significant series of major development opportunities, which will be brought forward in an area extending westwards from the Quays along the Manchester Ship Canal and the M62 motorway, and which forms part of a larger growth corridor stretching westwards through Warrington to Liverpool. It will also be important for Trafford and Warrington to work together where matters of cross boundary significance arise as you develop your spatial strategy.

Trafford Council looks forward to working with Warrington Council in the future.

Yours sincerely,



Clare Taylor-Russell

Strategic Planning and Growth Manager  
Strategic Growth Services

Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
Cheshire  
WA1 2NH

**Our ref:** SO/2006/000276/CS-04/IS1-L01

**Date:** 05 December 2016

**FAO Sarah Farrington**

Dear Madam

**Warrington Local Plan Review - Regulation 18 Consultation**

Thank you for referring the above document to the Environment Agency for consultation. We would like to make the following comments:-

**Scope and Contents Document – October 2016**

We note from section 2.25 of the document that the Council are in the process of updating the Strategic Flood Risk Assessment, we would like to advise that since the previous consultation on the Local Plan and Sustainability Appraisal, the Environment Agency has produced new Climate Change Guidance which outlines new allowances which need to be considered as part of any Strategic Flood Risk Assessment (SFRA) for Local Plans. (<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>).

The National Planning Policy Framework is clear that any Local Plan has to be based on the most up to date environmental evidence (Para 158). The SFRA for Warrington was dated 2011 and as a result will need to be reviewed against the latest guidance that has been produced. This should then be used to inform any policies within the local plan (NPPF Para 100), particularly around climate change and site allocations, but also to inform the Sustainability Appraisal baseline and the key theme for '*Climate Change and resource Use*'.

**Sustainability Appraisal (SA) of the Warrington Local Plan Core Strategy – Plan Review – Draft Scoping Report – October 2016**

We also note that within the SA and draft Site Appraisal Framework (Appendix A) it states that the '*Climate Change and resource Use*' objective and the indicator to '*limit, mitigate and adapt to the impacts of climate change*' is not applicable. Associated comments within the table also state that information is not available to make any assessment. With regards to the latest climate change guidance we would suggest that this is particularly relevant to allocations within the plan and that this information is used to inform this objective.

Environment Agency  
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

We would also suggest that the climate change objective and indicator could also include a reduction in greenhouse gas emissions and improvement in air quality. We are aware that Warrington have data available to inform this objection from the LEP low carbon work around reduction of greenhouse gases.

### **Green Belt Assessment – Final Report – 21 October 2016**

We would recommend before the release of any green belt land for development is considered, that the wider environmental and green infrastructure aspects are fully assessed; as well as landscape quality; and these be integrated into any future decision making process for releasing greenbelt land within Warrington Borough.

We would suggest before the release of any existing greenbelt that the borough's ecological assets be actively considered and integrated in any green belt re-appraisal process i.e., national or local wildlife sites and ecological connectivity with wider natural environment; as advocated in national Biodiversity strategy [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf); river corridors and their current statutory Water Framework Directive (WFD) status and the potential multiple ecosystem benefits i.e., floodrisk and natural flood management, water quality, climate cooling etc., the natural environment and particular river corridors can play in achieving sustainable and climate resilient development for future.

A significant proportion of the existing green infrastructure in the Warrington is associated with river and canal corridors, but at present the majority of waterbodies are failing their statutory environmental objectives as set out in the North West River Basin Management Plan (RBMP) (<https://www.gov.uk/government/collections/river-basin-management-plans> ).

We would seek to ensure that a high quality and multifunctional green infrastructure be an integral element of all new development. Therefore before any release of riparian greenbelt sites for potential future development, there be a wide ranging assessment process encompassing all environmental aspects of site, to ensure such a release of greenbelt would not cause deterioration or loss of quality of existing green infrastructure functioning.

We would welcome as part of the local plan document an element that reflects these challenges our current rivers and wetlands face, and promote better integrated riparian development, and rehabilitation and restoration of river corridors that have been negatively impacted by previous poor riparian development, enabling these river valleys to become multiple functioning green infrastructure assets for both people and wildlife, and helping achieve a far more resilience to future climate change pressures. The Agency would welcome opportunity to embed a high quality green infrastructure and where feasible to enhance currently poor, heavily built encroached or impacted river reaches, and work to guiding principles outlined in Rivers by Design guidance document ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/297315/LIT8146\\_7024a9.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297315/LIT8146_7024a9.pdf) ).

We would be particularly concerned with the release of any greenbelt land in the Mersey Corridor (Site 5 general area map) as this is a high quality ecological network with adjoining national and local wildlife sites, and also plays an important part in providing a multiple functioning green infrastructure asset through the Warrington Borough. Also future inappropriate development potentially poses environmental deterioration risk of existing already WFD failing River Mersey and Manchester Ship Canal waterbodies, and would seek such key ecological networks are protected, and

where feasible enhanced as part of Warrington Local Plan.

We would also suggest before the release of any riparian and/or wetland greenbelt sites that are directly within or adjoin local wildlife sites, i.e., sites WR3, 9, 24, 25, 26, 27, 28, 29, 72, 76, GB 8, 9 and NW 3, 4 that appropriate environmental assessment of the ecological and green infrastructure value of these sites be fully considered as part of any green belt re-appraisal methodology.

I hope these comments are useful to you and I look forward to consultation on further Local Plan documents.

Yours faithfully

**Ms DAWN HEWITT**  
**Planning Advisor**

7th September 2017

Michael Bell  
Planning Policy and Programmes  
Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
WA1 2NH

Dear Mr Bell,

### **Warrington Borough Council's Local Plan Preferred Development Option Consultation**

We would like to take this opportunity to thank you for consulting and inviting comments from Manchester Airport on your Local Plan Preferred Development Option Consultation. We are supportive of the direction of the Local Plan in guiding community involvement in planning matters and welcome the intended promotion of community participation in the planning system.

#### Introduction

The role that Manchester Airport plays in the City Region is not mentioned in the Local Plan Preferred Development Option Consultation and there is no mention of the local or regional contribution Manchester Airport makes to the local economy or the North West region as a whole.

Manchester Airport is the largest airport outside of the South East and the UK's third busiest airport, handling around 27 million passengers in 2016. The Airport serves more than 225 destinations worldwide and enjoys significant cargo operations. As the primary international gateway for the North, Manchester Airport provides crucial links with overseas markets and is recognised as a key driver of the North West Economy. The Airport employs 22,000 people on site, with a further 45,000 jobs in the wider region. The Airport generates an estimated £925 million of GVA for the North West region.

#### Commentary – High Level Strategic Objectives

As a major business, transport facility and economic hub located in close proximity to the borough, it is imperative to consider how such influences impact upon the borough when developing your Local Plan Preferred Options, and to ensure that an appropriate policy framework is put in place to enable Warrington to benefit from and contribute to the economic advantages and transport facilities that Manchester Airport brings to the region.

Olympic House  
Manchester  
M90 1QX  
United Kingdom

The Borough of Warrington is well placed to contribute towards and benefit from economic growth at Manchester Airport. The value of good connectivity to the airport along the M56 should be given priority within the document, with details of how this connectivity could be used to facilitate the growth of businesses within the borough. Existing local businesses could be opened up to international markets, with well-developed road and public transport links already in place to facilitate this.

The value of the airport in terms of its economic contribution to the borough is not evidenced in the Local Plan Preferred Options document.

### Warrington Garden City Suburb

The proposed Warrington Garden City Suburb and employment development at Junction 9 of the M56 are intrinsic parts of the Preferred Development Option Document. The wider site to the south east of Warrington Town Centre is located 14km to the west of Manchester Airport, with an approximate drive time of 20 minutes, directly east along the M56.

The Land at Junction 9 of the M56 is detailed as being the cornerstone of the borough's future employment provision, along with Warrington Waterfront. It is remiss to not consider the potential for aviation and airport related development at the site.

Additionally, given the number of jobs provided at the airport, it would be beneficial to consider the relationship between the proposed populous of the new Garden City Suburb and Manchester Airport. Both in economic and social terms, including public transport and potential earnings brought into Warrington.

Given the scale of the proposed urban extension and the requirement for a network of new distributor roads, a new secondary school, up to 4 new primary schools, a major new park, district centre, health facilities and leisure facilities, as detailed in section 5.33 of the Warrington Borough Council Local Plan Preferred Development Option Document a Masterplan will be required for the potential development. Manchester Airport would appreciate being included in any future discussions surrounding the preparation of the masterplan.

### Further Development Options

The Local Plan Preferred Development Option Document provides further specifics for development including, Warrington New City, City Centre, Warrington Waterfront etc. One option is the development of a South Western Urban Extension. Our comments on this are as above for the proposed Garden City Suburb.

### Commentary – Strategic Objectives

We are supportive of the range of strategic objectives that have been identified in the Preferred Options document and particularly welcome objective W1 and W4.

We agree with the intention of W1 to promote economic growth within Warrington and transition the town into a city. Supporting transport measures and improved accessibility will be an

important means of securing economic growth and competitiveness. As discussed above including details of how Manchester Airport can support this growth and transition would offer a foundation for economic growth.

Additionally, Manchester Airport fully support Objective W4 as an efficient and sustainable transport network will be essential to delivering the overall vision for the Borough.

Given Warrington's prime position on the junction of the M56 and M6 we would suggest including the scope for the enhancement of links to national and international infrastructure (such as Manchester Airport).

Ensuring there are effective transport links and improved accessibility between Manchester Airport and the Borough is vital. As detailed above, these connections are not only of benefit to the borough's residents who are travelling as passengers or working and accessing job opportunities at the airport but also help to unlock economic benefits that can help deliver growth within Warrington (as above, including the vision for an urban extension to the south east of the town). The Airport provides rapid international access that is important to many modern businesses, provides a link with overseas markets, helps businesses to transport people and goods, and win new business. Thus it is conveniently located for many of Warrington's existing businesses to benefit from and is a major influencing factor in attracting new businesses to the Borough and ultimately enabling the Borough's businesses to grow their contribution to the regional economy.

Transport for Greater Manchester are currently exploring opportunities for enhanced access to Manchester Airport from the surrounding areas. A potential stream of business growth within Southern Warrington and the proposed Urban Extensions is the possible introduction of Park and Ride Schemes associated with the airport.

Commentary – Further Issues – Housing & Employment Targets / Gypsy and Traveller Sites / Call for Sites

We do not have any specific comments regarding the proposed figures of housing and employment growth (aside from those above, relating to the connection between growth and Manchester Airport). We would like to emphasise that many of the sites proposed in the call for sites benefit in terms of their connectivity to Manchester Airport and the associated economic benefits identified above.

The direct links to Manchester Airport from Warrington Railway Station should also be cited as a strength attributed to the Warrington Town Centre. Similarly, the convenient motorway access that is afforded to both the existing town and proposed Urban Extensions will be advantageous in terms of providing convenient access to Manchester Airport that new or existing businesses in Warrington may seek

Commentary – Other Considerations

Further to this, we also have a role as a statutory consultee in the development management process due to our official designation as a safeguarded aerodrome (selected on the basis of

our importance to the national air transport system). This is to ensure that the safe operation and development of the airport is not compromised in any way by potentially hazardous development and activity in its vicinity. In order to determine the safety implications of a proposal there is an established safeguarding process between local planning authorities and safeguarded aerodromes.

Legislative provisions regarding the process of Aerodrome Safeguarding are set out in the Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 (ODPM Circular 1/2003). Manchester Airport is an officially safeguarded aerodrome and under Circular 1/2003 local planning authorities within Manchester Airport's safeguarded area are obliged to consult the Airport on planning applications for developments that have the potential to impact the safe operation of aircraft or that may prejudice the Airport's future development.

Safeguarding maps are issued to Local Planning Authorities by the CAA and these show the extent of the safeguarded area and set out the requirements for statutory consultation with the Airport. For Warrington this includes all buildings, structures, erections or works exceeding 90m in height, any proposal within 13km of the aerodrome with the potential to attract birds (e.g. significant areas of landscaping, water bodies, nature reserves, bird sanctuaries, waste facilities, sewage works, mineral extraction or quarrying), all proposals connected with an aviation use within 13km of the aerodrome, and all applications for wind turbines throughout the whole of the Borough.

Warrington Borough Council must therefore, before granting planning permission for a development of land falling within the criteria indicated on the Safeguarding Map, consult the Airport as Statutory Consultee to the planning process.

A robust all-encompassing safeguarding policy would therefore be of benefit in order to protect the aviation operations of Manchester Airport. We recommend the following text to be included within the relevant Development Management Policy – "Development which would adversely affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted." This should be accompanied by an explanation of why the policy is required.

As above, Aerodrome Safeguarding does not just apply to wind turbine development and as per our response to the Draft Statement of Community Involvement we welcome the reference that has been made in Table 5 to ODPM Circular 1/2003 – Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, and to the acting Aerodrome Safeguarding Authorities.

However, as detailed in our response of 6 February 2014 the text that has been cited here does not address safeguarding consultation procedures in their entirety and we would therefore also encourage you to formulate a specific policy relating to Aerodrome Safeguarding in general. Other types of development may also pose a threat to aircraft and aviation systems, for example by reason of height or attraction of birds, and planning applications that fall within Manchester Airport's safeguarded area will need to be assessed against the various safeguarding criteria.

Thank you again for providing Manchester Airport with the opportunity to comment on your draft Local Plan Preferred Development Option Consultation. We hope that our comments have been useful but please don't hesitate to contact us if you have any questions or wish to discuss any of the points made in more detail. Thereafter, we would be grateful if you could include us in any future correspondence.

Yours sincerely,

Lewis Wright  
Planner

# Cheshire West & Chester Council

## Planning & Strategic Transport

Nicholas House  
Chester

Tel: 01244 973140

Our ref: Warrington/DTC

Your ref:

Please ask for: Gill Smith

Email: [gill.smith@cheshirewestandchester.gov.uk](mailto:gill.smith@cheshirewestandchester.gov.uk)

Web: [www.cheshirewestandchester.gov.uk](http://www.cheshirewestandchester.gov.uk)

Date: 27 September 2017

Michael Bell  
Planning Policy & Programmes Mgr  
Warrington Borough Council  
3<sup>rd</sup> Floor New Town House  
Buttermarket Street  
Warrington  
WA1 2NH

Dear Michael

## Warrington Borough Council Local Plan Consultation 2017

Thank you for consulting Cheshire West and Chester on the latest proposals for Warrington's Local Plan. A significant amount of work has gone into the Plan and the accompanying evidence base and CWAC welcome the opportunity to comment. Throughout the Plan preparation process Warrington has engaged constructively CWAC over potential cross-boundary strategic issues. Cheshire West will also shortly be formally consulting Warrington on the publication draft of the Local Plan (Part Two) Land Allocations and Detailed Policies.

It is noted that in response to a representation received from NLP after the last round of consultation that the Council's consultants have reaffirmed the housing market area for Warrington. As reflective of the evidence it is agreed the two boroughs are not part of the same housing market area. The additional work also identified that the boroughs do not operate as a functional economic area as the evidence demonstrates that the LEP boundary is not reflective of Travel to Work areas. Cheshire West and Chester agree with this assessment and this also reflects the evidence base used to prepare the CWAC Local Plan (Part One).

It is recognised that through the devolution joint working which took place that Warrington had significant ambitions in delivering economic growth and unlocking public land for wider benefit. This is reflected in the draft proposals although most, if not all, Local Planning Authorities in the wider area (including Cheshire West) are planning for levels of growth in excess of household projections and indeed the Government's draft OAN proposals. This reflects a desire to plan positively for economic growth however this will require the retention and attraction of working age people to achieve ambitions. As part of modifications to its Cheshire East Local Plan it was identified that there would need to be migration and

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and Chester

commuting from neighbouring authorities to meet job growth ambitions. Although Cheshire West was highlighted as being potentially significantly affected CWAC took the view that is extremely difficult to predict where people choose to live and work. Given the cross-boundary movements between Warrington and CWAC are more limited CWAC has no additional comments to make on this issue.

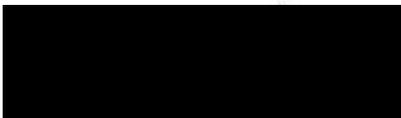
In relation to other issues CWAC has the following comments:

- GTAA – CWAC is leading on the update to the GTAA and Warrington, Cheshire East and Halton are supporting this work. It is hoped the GTAA will be published before the end of the year.
- Waste - The document does mention looking at sites outside the borough to meet waste needs so it would be useful to understand in more detail how Warrington is seeking to deal with this.
- Minerals – it is recognised that the Plan is at an early stage of preparation and the Minerals Safeguarding Areas have been identified. CWAC would welcome continued discussion especially on requirements for sand and gravel although this may be addressed through the joint working by the AWP.
- Infrastructure – CWAC recognises a great deal of work has been undertaken on this and the commitment to working with key bodies such as Highways England. The draft proposals propose a number of significant allocations that will impact on the Strategic Road Network including the M56 and M6 and CWAC would wish to understand these impacts and whether mitigation is necessary.

I would like to highlight that this is an Officer view only. I note in the consultation documents that Warrington have said they will speak to neighbouring authorities and other DTC bodies after the close of the consultation and we would welcome this opportunity.

If you require any further explanation please contact me.

Yours sincerely



Gill Smith  
Planning Policy Manager

Date: 29<sup>th</sup> September 2017  
Our ref: 221273



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Planning Policy and Programmes  
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Dear Sir/Madam

**Warrington Borough Council Local Plan Preferred Development Option Regulation 18 Consultation**

Thank you for your consultation on the above, which was received by Natural England on 18<sup>th</sup> July 2017.

Natural England would welcome an early opportunity to meet and discuss the Warrington Preferred Option and associated Local Plan review, so that we can work to find solutions to possible issues and also the opportunities that this option presents. A meeting on how we can help develop and enhance some of the objectives in the wider plan, and discuss how ecological networks, green infrastructure and net gain, as required by NPPF can best be incorporated into the plan. It would also be beneficial to discuss the evidence that will be needed on which to base an effective Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) assessment as the plan progresses.

By identifying and resolving issues early on in the process, we would expect to free up resources to support the development of policy solutions and ensure that your plan is able to maximise the natural capital of Warrington to deliver social, economic and environmental benefits.

It would be beneficial to also use this opportunity to discuss the Western Relief Road proposal that is also being consulted on, as the opportunities and possible issues around this are closely interlinked with the Preferred Options proposals.

I will be in contact shortly to discuss how Natural England can work more closely with you during the development of this Plan and arrange a meeting date.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours Faithfully

Kate Wheeler  
Lead Adviser  
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team



Michael Bell  
Planning Policy and Programmes Manager  
Warrington Borough Council  
Town Hall  
Sankey Street  
Warrington  
WA1 1UH

*Our ref* WBC/LPPDO/001

*Your ref*

28<sup>th</sup> September 2017

Dear Sir,

**Warrington Borough Council: Local Plan Preferred Development Option  
Consultation**

Thank you for consulting Transport for Greater Manchester (TfGM) on the development of Warrington's Local Plan Preferred Development Option. TfGM recognises that growth can bring benefits to the wider region including Greater Manchester, however it is important to ensure the growth of the wider region can be managed within the capacity of the available infrastructure.

TfGM welcomes Warrington's focus placed on the regeneration and continued evolution of the current town centre. Identifying the significant additional capacity that can be delivered through the regeneration plans for the town centre, Warrington Waterfront and wider inner Warrington area, will help strengthen the case for any future public transport improvements within Warrington and between Warrington and the surrounding areas, including Greater Manchester. It will therefore be important to maximise the capacity of the existing urban area to accommodate new development.

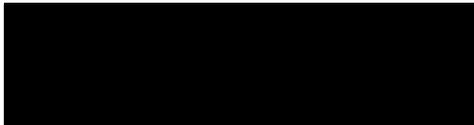
TfGM note the recognition within the Preferred Development Option that in order to deliver this scale of growth there is the need for significant investment in infrastructure. Warrington MBC (alongside TfGM) is working as a member of Transport for the North to improve the strategic transport connections to the town centre from Manchester, Liverpool and other major urban areas in the North West and plans for a major redevelopment of Bank Quay station. We welcome the recognition that to complement major infrastructure investment there is a need for a programme of ongoing improvements to road and public transport

connections to the centre from across the wider Warrington area as well as improvements to the public realm and accessibility within the centre itself.

TfGM recognises the challenges of accommodating growth. Significant housing and employment growth will generate additional demand on local and regional transport networks including the rail network, the Strategic Road Network, and the Key Route Network within Greater Manchester. TfGM looks forward to working with Warrington MBC and other stakeholders to help address these challenges. While increased demand is symptomatic of growth, it can also act as a constraint on future growth, and it is therefore essential to accommodate travel needs as sustainably as possible, maximising the efficient movement of people and goods. It will be important to ensure that the Local Plan emphasises that future residential and employment development should be designed in a way that prioritises and encourages sustainable and active travel options, in all the identified growth areas.

I hope these comments will be helpful in the progression of the Warrington Local Plan, and we look forward to working together in future. If you wish to discuss any of the issues raised, please do not hesitate to contact me.

Yours sincerely



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27 September 2017

Dear Sir / Madam

## **WARRINGTON BOROUGH COUNCIL LOCAL PLAN PREFERRED DEVELOPMENT OPTION CONSULTATION**

As a statutory consultee in the planning system, Highways England has a regulatory duty to co-operate. Whilst Highways England are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses, our desire to be a proactive planning partner goes beyond this statutory role, but follows the spirit of the Licence which stipulates that Highways England should: *“Support local and national economic growth and regeneration”*.

Highways England is charged with operating, managing capacity, maintaining and improving England’s motorways and major A roads, which form the Strategic Road Network (SRN). It is an ambition to ensure that major roads are more dependable, durable and most importantly – safe. Therefore, this review considers the proposals within the Warrington Local Plan Preferred Development Option (WLP PDO) and the Warrington Transport Summary 2017 (WTS), particularly focusing on the potential for impact upon the safety and operation of the SRN in the Warrington area.

The SRN in Warrington comprises sections of the M6, M62 and M56, with the M6 running to the East of the main urban area, the M62 running to the north of the main urban area, and the M56 running to the South of the area. Junctions 20, 21, 21A and 22 of the M6 all fall within Warrington. It is noted that the Lymm interchange (M6 Junction 20/M56 Junction 9) is located immediately adjacent to the borough boundary within Cheshire East, whilst the dumb-bell roundabout which feeds the north facing slips is located within Warrington. In addition, whilst the Junction 22 roundabout sits within Warrington, the north-facing slip roads fall within St Helens. Junctions 8, 9, 10 and 11 of the M62 all sit within the Warrington, as do Junctions 9 and 10 of the M56.

### **Key Findings**

Following the review of the WLP PDO and WTS, we would draw attention to the following key findings and recommendations:

- There is currently a high reliance on the private car for journeys to work generated by the Warrington area, with a risk that this existing behaviour will continue into the future;
- The Call for Sites process is at a very early stage with limited supporting transport evidence available for comment;
- The WLP PDO proposes a significant amount of new development within existing designated Green Belt peripheral to the existing urban form; these sites by their very nature are not currently the most accessible, and further work will be required to improve the sustainability of these locations;
- The documents acknowledge that there is a need for significant investment in infrastructure in Warrington. The documents identify high level proposals for highway improvements including motorway junction upgrades at M56 Junction 10, M6 Junction 20 and M6 Junction 21A. However, no detail is provided in terms of any proposals, and further assessments and evidence will be required to support any proposed improvements;
- A robust evidence base will be required to demonstrate the need for junction improvements. Providing this evidence base will enable Highways England and the Council to work together to identify schemes that are feasible in terms of construction, finance and deliverability. This should not be taken as acknowledgement that Highways England will finance the schemes and any scheme delivery would require prior agreement with Highways England;
- The proposed new Western Link infrastructure (to which Highways England have already provided a separate consultation response) could lead to a level of traffic redistribution around Warrington with some impacts for the SRN, and requires further detailed assessment as part of a wider package of potential highway infrastructure improvements;
- A comprehensive and transparent cumulative assessment of the growth proposed in the WLP PDO (along with growth from neighbouring areas and agreed sites) is required, to enable Warrington Borough Council and Highways England to understand the traffic impacts upon the local and strategic road networks. Early traffic modelling work undertaken on behalf of Highways England has indicated material impacts on the operation of the SRN around Warrington associated with future increases in traffic. Further work will be required in parallel to the ongoing development of Warrington Borough Council's Warrington Multi-Modal Transport Model to substantiate potential SRN impacts and to identify appropriate strategies to cater for the targeted growth;
- It is recommended that the transport evidence should include a phasing strategy that links development thresholds to associated highway impacts and mitigation strategies. The strategy should identify measures that can be put forward in the short-term to address identified highway impacts, and in the longer-term, identify the point in time that improvements are required to be implemented in order to support the ambitious growth targets set out in the plan; and
- Highways England would welcome the opportunity to continue to work with Warrington Borough Council to ensure that the Draft Local Plan is supported by a robust transport evidence base, and would welcome the opportunity to engage in

ongoing collaborative working relations to support Warrington Borough Council's growth ambitions.

## **Background**

Prior to the current round of public consultation, the Council undertook a 6-week period of consultation on the scope and contents of the Local Plan review and the Council's initial Local Plan evidence base between October and December 2016. The Council received a total of 78 responses from developers, landowners, Parish Councils, local residents and other stakeholders. At the same time as the public consultation process, the Council also invited developers, landowners, the local community and other stakeholders to submit sites they wanted to be considered as part of the plan review. The Council received over 150 submissions for its Local Plan 'Call for Sites'.

At present, the Council are consulting on the WLP PDO which sets out the proposed approach to addressing Warrington's need for new homes and jobs up to 2037. It also identifies that significant investment in infrastructure is required to ensure that Warrington's growth is sustainable.

As part of the WLP PDO, broad locations for potential development have been identified based on the revised aims and objectives of the Local Plan review and an assessment of the spatial distribution of development.

The responses to the WLP PDO consultation will then inform the next stage of the Local Plan process; preparation of the Draft Local Plan. The Draft Local Plan will be the formal plan that Warrington Borough Council will publish for consultation and subsequent independent examination (currently timetabled for 2018).

Warrington Borough Council has also recently consulted on a new Western Link highway scheme, providing an alternative access route to the west of the town centre. The new crossing would increase route options for crossing the River Mersey and Ship Canal and thereby enhance network resilience. Nevertheless, the scheme has the potential to lead to a level of traffic redistribution around Warrington, and the results of future traffic modelling will need to be reviewed to determine any potential impact upon the SRN. It was recommended that Highways England request ongoing engagement with Warrington Borough Council regarding not only the Western Link proposals but also wider infrastructure proposals to support Local Plan growth, and to work collaboratively with the local authority to understand the impacts of growth and the potential infrastructure proposals.

## **Warrington Transport Summary 2017**

Warrington Borough Council have undertaken an initial overview assessment of transport provision and needs in Warrington to identify existing problems and opportunities for improvement. This is presented in the Warrington Transport Summary (WTS) and forms one element of the suite of documents supporting the Local Plan review.

Pertinent to the SRN, the WTS presents a summary of Warrington's population profile, car ownership, travel to work flows (including cross-boundary movements), mode share

distance travelled, vehicular speeds and highway accessibility. In a broad summary of current highways issues, it is stated that congestion at motorway junctions (unnamed) impacts upon journey times and journey reliability on the highway network. Additionally, the SRN was reported to act as a barrier to public transport. In terms of highway opportunities, the Council state that there have been reported improvements in KSI numbers in recent times.

The WTS recognises that excellent accessibility to the SRN means most of Merseyside, Greater Manchester and Cheshire all fall within a 60-minute drive from Warrington. It is also noted that car ownership and reliance on the car for journeys to work is above the national average. For these reasons, it is recommended that Warrington Borough Council should undertake further work to plan for sustainable growth in locations that can be accessed by non-car modes of transport, and which are not simply reliant on the availability of capacity on the SRN for future access and travel needs.

## **Warrington Local Plan Preferred Development Option**

### **Responding to Scope and Contents Consultation**

Highways England has previously submitted a response to the Strategic Housing Land Availability Assessment (SHLAA) consultation and has no further comments on the approach discussed. We recognise the Council's 'Duty to Cooperate' process and acknowledge the discussions held to date. Nevertheless, Highways England would welcome continued engagement to understand the potential impacts of the WLP PDO on their infrastructure and business planning and to help identify any mitigation measures that may be required.

### **Call for Sites**

Under its licence from the Department for Transport (DfT), Highways England is tasked with working with Councils and other bodies such as Local Enterprise Partnerships, the Homes and Communities Agency and developers to realise and maximise the growth in employment and housing whilst balancing the impact upon, and the needs of the wider users of, the SRN. Highways England would welcome the opportunity to work with Warrington Borough Council to understand the implications both individually and cumulatively of the potential sites should they be taken forward as part of the Council's Draft Local Plan. This is relevant as the Call for Sites returned the majority of sites within designated Green Belt peripheral to the existing urban form. Green Belt locations typically offer limited multi-modal accessibility, which in the absence of targeted intervention, may result in a greater mode share for private car use and in turn impact upon the efficient operation of the SRN. Should these sites be taken forward then Highways England would require an understanding of the impacts upon the SRN and detailed proposals to mitigate these impacts.

It is acknowledged that the Call for Sites is currently at an early stage with limited evidence available, thus this response has not gone into significant detail regarding the potential impact upon the SRN; instead our comments are recommended for detailed consideration should the sites gain further status in the ongoing plan preparation.

**Table 1. Call for Sites Ward Summary**

<b>Ward</b>	<b>Comment</b>
Appleton	Appleton Ward has sites totalling 269 hectares, with the majority comprising housing sites. Significant sites include the Land at Higher Walton which is a preferred housing site and comprises 125 hectares. Given the existing mode share in Warrington and the proximity to the M56 and M6, there is likely to be a potential cumulative and individual traffic impact on the M56 and M6 corridors, and M56 Junction 10, Lymm Interchange, and M6 J20 in particular.
Bewsey & Whitecross	No comment on individual proposal for ward allocation.
Burtonwood & Winwick	The Call for Sites results in 128.1 hectares of potential sites in Burtonwood & Winwick, comprising housing, employment and multi-use. Such development could result in a potential cumulative and individual traffic impact on the M62 corridor and M62 Junctions 9 and 10 in particular.
Culcheth, Glazebury & Croft	The Culcheth, Glazebury & Croft wards are targeted for sites totalling some 449.7 hectares, with the majority comprising housing sites. There are three significant individual sites in this ward; Land NW of Croft (129 hectares), Wider land north of Culcheth (111 hectares), and Land NE of Culcheth (96 hectares). Each individual site is preferred for housing. Given the existing mode share in Warrington and the proximity to the M56 and M6, there may be a potential cumulative and individual traffic impact on the M6 and M62 corridors, and the M62 Junctions 10 and 11 in particular.
Grappenhall	This ward has potentially 347.1 hectares of housing sites and 136.8 hectares of employment sites which could well result in a potential cumulative and individual traffic impact on the M6 corridor and M6 Junction 20/Lymm Interchange (J20a) in particular. Potential impacts could also extend to Junction 10 of the M56. Both the largest preferred housing site (Land to SE of Warrington, 22 hectares) and employment site (Land at Bradley Hall Farm, Cliff Road, 92 hectares) are located in this ward, with the Land at Bradley Hall Farm site located adjacent to the M6 corridor.
Latchford East	No comment on individual proposal for ward allocation.
Latchford West	No comment on individual proposal for ward allocation.
Lymm North & Thelwall	The Call for Sites results in 114.2 hectares of potential sites in the ward, comprising predominantly housing. There may be a potential cumulative and individual traffic impact on the M6 corridor and M6 J20/Lymm Interchange (J20A).
Lymm South	The Call for Sites results in 232.7 hectares of potential sites in the ward, comprising housing and multi-use. There may be a potential cumulative and individual traffic impact on the M6 corridor and M6 J20/Lymm Interchange (J20A).
Penketh &	This ward has potentially 106 hectares of housing sites and 74.2 hectares

Ward	Comment
Cuerdley	of employment sites which may result in a potential cumulative and individual traffic impact on the M62 corridor and M62 Junction 7 in particular. Significant sites include the Port Warrington site (74 hectares) which by its nature may lead to increased demand for strategic trips on the SRN.
Rixton & Woolston	The Call for Sites results in 211.2 hectares of potential sites in the ward, comprising housing and multi-use. There may be a potential cumulative and individual traffic impact on the M6 corridor and M6 Junction 21 in particular.
Stockton Heath	No comment on individual proposal for ward allocation.
Westbrook	No comment on individual proposal for ward allocation.

With regards to the possibility of the Fiddlers Ferry site potentially coming forward for redevelopment, Highways England would welcome the opportunity to comment upon proposals as evidence is prepared and plans progress. We would also welcome the opportunity to comment further should additional sites be identified from other parties that also may impact upon the SRN.

### **Towards a Preferred Development Option**

The WLP PDO sets out the strategic objectives for Warrington; objectives W1 and W4 both seek to develop strategic infrastructure, reduce congestion and promote sustainable transport options, and are welcomed and supported as strategic objectives and guiding principles for the further plan development.

The WLP PDO indicates three broad employment locations adjacent to the main urban area which could contribute to Warrington's employment land requirements. The three sites are identified as Land at M56 Junction 9, Land at Warrington Waterfront and Land adjacent to Omega. Highways England supports employment development in the most accessible and sustainable locations, however we would seek detailed evidence in relation to employment locations to substantiate potential impacts upon the SRN.

### **Preferred Development Option**

#### *Overall Approach – Warrington New City*

Warrington Borough Council acknowledge the need for significant investment in infrastructure in Warrington. However, Highways England have concerns regarding the limited transport evidence base and/or proposals for strategic transport infrastructure provided to date. It is suggested that such evidence is a prerequisite to ensure a sound and deliverable plan. In the absence of this evidence base, we have some concern that site allocations and mitigation are being proposed in the absence of a wider understanding of their cumulative impacts on the SRN around Warrington. At this stage in the plan making process, Highways England consider that there should be greater certainty over the required highway infrastructure improvements, including where and when they are required, who is responsible for delivering them, and how they will be funded.

Each of the proposed 'Transport Corridor Improvement Schemes' in Figure 10 of the report will have a level of interaction with the SRN and could impact upon its performance. Highways England would expect to see detailed assessments of these scheme proposals within a robust evidence base which demonstrates potential trip growth and potential redistribution impacts affecting the SRN.

The WLP PDO includes high level proposals for motorway junction upgrades at M56 Junction 10, M6 Junction 20 and M6 Junction 21A, although no plans or descriptions are provided. A robust evidence base will be required to demonstrate the need for junction improvements and if required, to allow Highways England and the Council to work together to identify schemes that are feasible in terms of construction, finance and deliverability. This should not be taken as acknowledgement that Highways England will finance the schemes and any scheme delivery would require prior agreement with Highways England.

It is noted that to fully achieve the WLP PDO, Green Belt release and investment in major infrastructure is required. The Council is proposing a stepped housing trajectory. It is proposed that there will be a relatively lower level of housing delivery for the first 5 years of the plan period given that land will remain in Green Belt until the plan is adopted and to allow for key enabling infrastructure to be delivered. It is proposed that housing will be delivered at a higher rate over the next ten years of the plan before reducing towards the end of the plan period. It will be crucial that phased delivery of identified mitigation is optimised to allow for growth but without significantly impacting upon the SRN. The absence of any detailed evidence of proposed infrastructure improvements and associated impacts in relation to the operation of the SRN should be rectified as part of the further plan development.

Highways England recommends that the overall approach should be developed from a sound evidence base – the only transport related evidence currently available is presented within the WTS. This is not considered to be sufficient as it provides only a high-level assessment of existing provision and needs.

#### *City centre*

Highways England supports the aim to provide additional capacity and congestion relief to allow the City Centre to maximise its development potential.

#### *Wider Urban Area*

The wider urban area contains many of the strategic employment sites for the region, as well as significant retail and leisure sites. It is noted that the Council's latest Infrastructure Delivery Plan (IDP) will be updated ahead of the publication of the submission version of the Local Plan. A series of key schemes, including east-west road improvements, are introduced in the WLP PDO.

#### *Warrington Waterfront*

Consultation material for the proposed 'Western Link' highway scheme suggests that commencement of construction works (subject to funding award) could be expected in the early 2020s. Highways England have provided comment previously regarding the 'Western Link'.

### *Warrington Garden City Suburb*

The WLP PDO states that there is a significant requirement for infrastructure improvements to support the targeted level of growth in this area, including a network of new distributor roads. To achieve the full development potential of the area, an additional connection across the Ship Canal may also be required. Given the scale of development proposals, it will be necessary for the Council to prepare a more detailed masterplan and ensure the timely delivery of infrastructure to support individual phases of development. Highways England is not aware of any evidence being in place to demonstrate the impact of the proposed Garden City on the local or strategic road networks. The absence of any traffic modelling evidence of the performance and effects of the proposed infrastructure is of concern to Highways England at this time. We would welcome the opportunity to be involved with this assessment work to understand the implications upon the SRN and proposals for highway infrastructure improvements to ensure they provide the necessary mitigation. This should not be taken as acknowledgement that Highways England will finance such schemes and any necessary infrastructure improvements to the SRN would require prior agreement with Highways England.

### *South Western Warrington Urban Extension*

We acknowledge that a more detailed assessment of highway capacity will be required to confirm the development trajectory of the South Western Warrington Urban Extension. The scheme layout itself and the resultant impacts upon the SRN will be influenced by the final route and delivery of the 'Western Link'. Highways England would like to see the modelled evidence of the performance and effects of the Western Link on the SRN.

### *Outlying Settlements*

It is noted that the Council has decided to hold back detailed site assessment work to confirm the individual sites to be allocated until after the WLP PDO stage. The allocation of sites should be based upon a sound and robust transport evidence base. Highways England would welcome the opportunity to work with Warrington Borough Council to understand the cumulative impacts upon the SRN, once the scheme plans have been developed and to ensure an appropriate and robust transport evidence base is available prior to the Draft Local Plan being published for consultation.

## **Traffic Modelling and Next Steps**

Highways England recognise that a key element of identified assessment work will be to test the proposed site allocations through the updated Warrington Multi-Modal Transport Model. This will enable the Council to consider transport impacts arising from new development, particularly for the local highway network. We would welcome the opportunity to work with Warrington Borough Council to ensure the plan is supported by a robust transport evidence base, including an assessment of the impact of the plan upon the SRN and that appropriate mitigation measures are proposed.

In advance of the availability of the Warrington Multi-Modal Transport Model, Atkins has undertaken traffic modelling work using a VISSIM micro-simulation model for the SRN network surrounding Warrington. The work has sought to assess the impacts of phased

delivery of the WLP PDO on the SRN, with early work undertaken to assess the traffic generation and distribution of potential allocation sites. Separate model assessments have been undertaken to consider the first five years of Local Plan development, along with the full quantum of development set out within the WLP PDO. The work has taken account of current highway infrastructure commitments associated with Highways England's Road Investment Strategy (RIS1), along with Warrington Borough Council's own committed upgrades at M62 Junction 8. Beyond these initial commitments, further consideration has been given to potential schemes that may or may not come forward as part of future RIS stages. The modelling work is considered part of an ongoing study. Thus far, only initial high level results have been obtained, while further detailed analysis and refinement is intended to be undertaken, culminating in the release of a detailed technical report.

Nevertheless, the traffic modelling work has demonstrated the significant challenges associated with not only bringing forward the targeted level of growth, but also catering for growth associated with neighbouring authority areas and the general increase in background traffic levels on the SRN. Modelling work has indicated material impacts on the operation of the SRN around Warrington associated with future increases in traffic. Further work will be required in parallel to the ongoing development of Warrington Borough Council's Warrington Multi-Modal Transport Model to substantiate potential SRN impacts and to identify appropriate and available strategies to cater for the targeted growth, by way of improving the accessibility and sustainability of allocation sites, and through implementation of appropriate highway infrastructure improvements. The work serves to highlight the need for the development of a realistic, robust transport evidence base at the earliest opportunity. We would welcome the opportunity to work alongside Warrington Borough Council to deliver the necessary evidence base drawing on the alternative modelling tools available.

## **Conclusions**

The Localism Act 2011, placed the responsibility of 'Duty to Cooperate' on local authorities, to ensure that any local or cross-boundary impacts have been fully considered and addressed appropriately in preparing the Local Plan. The local authority must demonstrate that they have discussed such matters with the relevant bodies, including Highways England.

Highways England notes that the Warrington Local Plan is at an early stage and that significant work needs to be undertaken in relation to assessing the transport impacts of the proposed growth. At this stage, we have concerns regarding the breadth and depth of available transport evidence, which could affect the soundness and deliverability of the plan. The allocation of sites should be based upon a sound and robust transport evidence base that accounts for the need, effectiveness and deliverability of proposed highway infrastructure improvements.

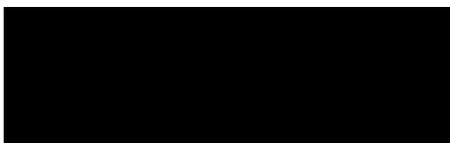
We request that a comprehensive and transparent cumulative transport assessment is undertaken of the proposals set out in the WLP PDO, along with growth from neighbouring areas and agreed sites. These are required to assist Highways England in forming a full understanding of the implications of growth in Warrington on the future operation and performance of the SRN.

Highways England recommend that the transport evidence base should include consideration of thresholds for development and associated highway impacts, demonstrating the level of highways impact associated with phases of development. The evidence base and subsequent IDP should then identify an appropriate phased mitigation strategy to address identified impacts, both on the local and strategic highway networks.

Initial modelling work undertaken by Atkins suggests that the level of growth set out in the WLP PDO could have a significant impact on the SRN. This serves to highlight the need for the development of a realistic, robust transport evidence base and mitigation strategy at the earliest opportunity.

We would welcome the opportunity to continue to work with the Council to ensure the plan is supported by a robust transport evidence base prior to the publication of the Draft Local Plan. The transport evidence base must be sufficient, demonstrate that there are no issues that impact upon the deliverability of the plan and facilitate the growth aims as much as possible. As such, there also needs to be an emphasis on recognising the deliverability (in both engineering and funding terms) of mitigating infrastructure-based measures that are being proposed.

Yours faithfully



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21 September 2017

Dear Sir / Madam

**Warrington Borough Council : Local Plan Preferred Development Option Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood  
Consultant Town Planner

[n.grid@amecfw.com](mailto:n.grid@amecfw.com)

Amec Foster Wheeler E&I UK  
Gables House  
Kenilworth Road  
Leamington Spa  
CV32 6JX

Yours faithfully

[via email]

**Robert Deanwood**  
Consultant Town Planner

Spencer Jefferies  
Development Liaison Officer, National Grid

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& Infrastructure UK Limited  
Registered office:  
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Cheshire WA16 8QZ  
Registered in England.  
No. 2190074





United Utilities Water Limited  
Developer Services & Planning  
1<sup>st</sup> Floor, Grasmere House  
Lingley Mere Business Park  
Lingley Green Avenue  
Warrington  
WA5 3LP

[jenny.hope@uuplc.co.uk](mailto:jenny.hope@uuplc.co.uk)

**Your ref**

**Our ref**

**Date**

5<sup>th</sup> October 2017

**By Email ([ldf@warrington.gov.uk](mailto:ldf@warrington.gov.uk))**

Dear Sir / Madam,

**LOCAL PLAN REVIEW - PREFERRED DEVELOPMENT OPTION  
CONSULTATION (SEPTEMBER 2017)**

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

The Local Plan Review will set out Warrington's proposed approach to meeting Warrington's need for new homes and jobs between now and 2037. United Utilities wishes to submit the following comments to the Council as part of the current Preferred Development Options Consultation.

**GENERAL COMMENTS**

United Utilities wishes to highlight that we will seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify

any infrastructure issues and appropriate resolutions throughout the development of the Local Plan.

### **Future Site Allocations**

Whilst the current Preferred Development Options document identifies strategic locations for new development, one of the roles of the Local Plan will be to allocate individual development sites to deliver specific types of development. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the chosen points of connection.

Once more information is available with respect to specific development sites, which is often only at planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We suggest that this should be included as a detailed development management policy and can advise on appropriate wording.

Please note that United Utilities seeks to undertake further discussions with the Council on technical matters relating to site-specific development, such as site drainage and the Surface Water Hierarchy, once it has identified its preferred site allocations. In your selection criteria, we would encourage the Council to consider the availability of alternatives to the public sewerage system for surface water discharges. For example, sites with land drains or near to watercourses are a more sustainable alternative to the public sewer. The need to minimise the connection of surface water to the public sewer is a critical matter for United Utilities. It reduces the likelihood of sewer flooding and pollution of the environment.

### **Development Areas and Infrastructure Capacity**

United Utilities acknowledges that the Local Plan Review (Preferred Options Consultation) identifies some significant development areas across various settlements and local authorities, including the release of a substantial amount of Green Belt. United Utilities wishes to note that given the volume of growth that is proposed, it is likely that there will be a need to respond with investment in our infrastructure. It is important to acknowledge that the development plan will cover the period up to 2037. This contrasts with our 5 yearly investment periods. Our current investment period covers the period 2015-2020. We are currently preparing for our next investment period which will cover the period 2020-2025. Any infrastructure investment response will therefore be brought forward over a number of the 5 yearly investment periods of a water and sewerage company. United Utilities wishes to highlight that it may be necessary to co-ordinate the delivery of development with the delivery of new infrastructure. We have recommended a policy in this regard which is set out later in this representation.

### **Groundwater Source Protection Zones (SPZ's)**

When assessing proposals for development within Groundwater Source Protection Zones (SPZ's) we would urge you to refer to the document 'Environment Agency Groundwater Protection: Principles and Practice (GP3)' to ensure any impact of development on groundwater quality in the area is most appropriately managed. The document encourages planners, developers and operators to consider the groundwater protection hierarchy in their strategic plans and when proposing new

development. In the first instance we would prefer development to not take place in close proximity to those groundwater protection zones which have a public water supply purpose. We have recommended a policy in this regard which is set out later in this representation. We recommend you also discuss any policy protection for the groundwater environment with the Environment Agency.

### **Wastewater Treatment Works (WwTW)**

When considering the suitability of each of the sites you assess as part of the Preferred Options consultation, we would urge you to consider proximity to existing wastewater treatment works (WwTW). It is important to explain that WwTW can result in emissions which include odour and noise as well as attract vehicle movements from large tankers. It is possible that new sites could introduce new sensitive receptors closer to the treatment works.

Our position is that it is more appropriate not to introduce new additional sensitive receptors near to an existing treatment works as part of the preparation of a new development plan. If, however, you are assessing the suitability of sites near to existing wastewater treatment works, we would welcome the opportunity to discuss the sites in further detail to ensure appropriate consideration.

## **SPECIFIC POLICY RECOMMENDATIONS**

### ***Surface Water and Foul Drainage***

New development should manage surface water run-off in a sustainable and appropriate way in accordance with national planning policy.

United Utilities recommends that the Council includes a policy in the emerging Local Plan on surface water management, and suggest including the following draft policy in the 'Preferred Options' version of the document:

*"Surface water should be discharged in the following order of priority:*

*An adequate soakaway or some other form of infiltration system.*

*An attenuated discharge to watercourse.*

*An attenuated discharge to public surface water sewer.*

*An attenuated discharge to public combined sewer.*

*The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency. Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available.*

*The preference will be for new development to include genuine sustainable drainage systems as opposed to underground tanked storage systems for surface water.*

*Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.*

*On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked.*

*On previously developed land, applicants should target a reduction of surface water discharge in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA. In demonstrating a reduction, applicants should include clear evidence of existing positive connections from the site with associated calculations on rates of discharge.*

*Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces.*

*On large sites it may be necessary to ensure the foul and surface water drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. The applicant will be expected to include details of how the approach to foul and surface water drainage on a phase of development has regard to interconnecting phases within a larger site. Infrastructure should be sized to accommodate flows from interconnecting phases and drainage strategies should ensure a proliferation of pumping stations is avoided on a phased development."*

With respect to the final paragraph of the above recommended policy, this is particularly relevant to the large development areas that you have provisionally identified. We recommend you give early consideration to a strategic approach to infrastructure on these development sites. With regards to drainage, this should include liaison with your colleagues in the Lead Local Flood Authority. United Utilities wishes to highlight the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice. Therefore we encourage the Council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we would strongly encourage the council to challenge the site promoters to present a clear site wide infrastructure strategy with clear evidence of any necessary 3<sup>rd</sup> party agreements.

On larger sites, it should be clearly demonstrated there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning.

Whilst we appreciate the Council has yet to identify any potential development sites as part of the Local Plan process, we strongly recommend this is addressed in advance of allocating specific sites.

### **Infrastructure Provision**

As detailed above, in some instances it may be necessary to coordinate infrastructure improvements with the delivery of development. In accordance with paragraphs 156 and 162 of the National Planning Policy Framework (NPPF), we recommend the following detailed policy is included as part of the Joint Local Plan in relation to infrastructure provision:

*"Once more details are known on development sites, for example, the approach to surface water management, the proposed connection points to the public sewer network and the demand for water from any particular occupier, it may be*

*necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.*

*At the larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.*

*The Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth and meeting the development needs of the Borough."*

In the context of the need to be able to flexibly respond to the needs of the borough, we note we have a number of assets which are sited within the green belt in your local authority. These include:

- Warrington South WwTW;
- Glazebury WwTW;
- Lymm Sowbrook Wastewater Pumping Station; and
- Winwick Service Reservoir.

Whilst our preference would be for the location of these sites in the green belt to be reviewed, if they are to remain in the green belt, we wish to recommend a policy that allows for infilling or redevelopment in accordance with paragraph 89 of the National Planning Policy Framework.

These amendments would enable us to ensure we can continue to meet the growth and development aspirations of the Borough, by ensuring that the fundamental infrastructure requirements of these future developments can be achieved.

### **Water Efficiency**

We note that Chapter 9: Energy and Climate Change of the consultation document makes no reference to water efficiency measures. Whilst we appreciate the Code for Sustainable Homes has now been scrapped as a result of the Government's 'Housing Standards Review' consultation, we suggest the emerging Joint Local Plan includes a new policy regarding water efficiency measures and the design of new development as follows:

*"The design of new development should incorporate water efficiency measures. New development should maximise the use of permeable surfaces and the most sustainable form of drainage, and should encourage water efficiency measures including water saving and recycling measures to minimise water usage."*

United Utilities wishes to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example.

Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for the treatment and pumping of both clean and wastewater.

### **Groundwater Source Protection Zones (SPZ)**

With respect to the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from locations which are identified as Ground Source Protection Zone 1 (SPZ1). Groundwater is a vital resource, supplying around one third of mains drinking water in England, however groundwater supplies are under pressure from development associated with an increasing population. The details of groundwater protection zones can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful.

United Utilities' strong preference is for development to take place outside of any Environment Agency designated SPZ1. Accordingly, we recommend the following specific policy is included within the emerging Local Plan Review in regards to groundwater protection:

"Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled 'Groundwater Protection: Principles and Practice (GP3) August 2013', or any subsequent iteration of the guidance.

New development within Groundwater Source Protection Zones will be expected to conform to the following:

i. **MASTERPLANNING** – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.

ii. **RISK ASSESSMENT** - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).

iii. **CONSTRUCTION MANAGEMENT PLAN** - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.

Within Source Protection Zone 1, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided."

## **Health and Well-Being**

In regards to health, well-being and maximising the quality of residential amenity, United Utilities wishes to highlight that it is more appropriate to locate sensitive uses (such as residential) away from existing sources of noise and odour.

We feel it is important to highlight that new development sites are more appropriately located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure

We wish to highlight that a wastewater treatment works can result in emissions which include odour and noise. Therefore, if you are considering any sites for new allocations, especially housing allocations, near to wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing such sites with potential alternative sites that may be available to you for allocation. The position of United Utilities is that when considering a range of sites to meet the housing needs of the borough, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works.

We wish to highlight our treatment works in your area include Warrington North WwTW, Warrington South WwTW and Glazebury WwTW. Plans of each of these sites are enclosed.

With respect to Warrington North and South WwTWs, we note the potential development areas which are close to the sites. With respect to Warrington North, we note development parcels in the wider area both to the north and south of the River Mersey which are part of Warrington Waterfront. With respect to Warrington South we note the area identified as the South West Extension. United Utilities would welcome the opportunity to discuss development in proximity to the treatment works in greater detail to try and ensure any development is most appropriately located with respect to any potential new sensitive receptors.

#### **LAND AVAILABLE FOR ALTERNATIVE USE – LINGLEY MERE**

United Utilities owns a parcel of land adjacent to its existing main offices at Lingley Mere Business Park. This parcel of land is also adjacent to the recent residential planning permission. We have enclosed a plan of the site. The land is anticipated to be available during the plan period and can therefore be considered by the Council as a potential residential site as part of the Local Plan process.

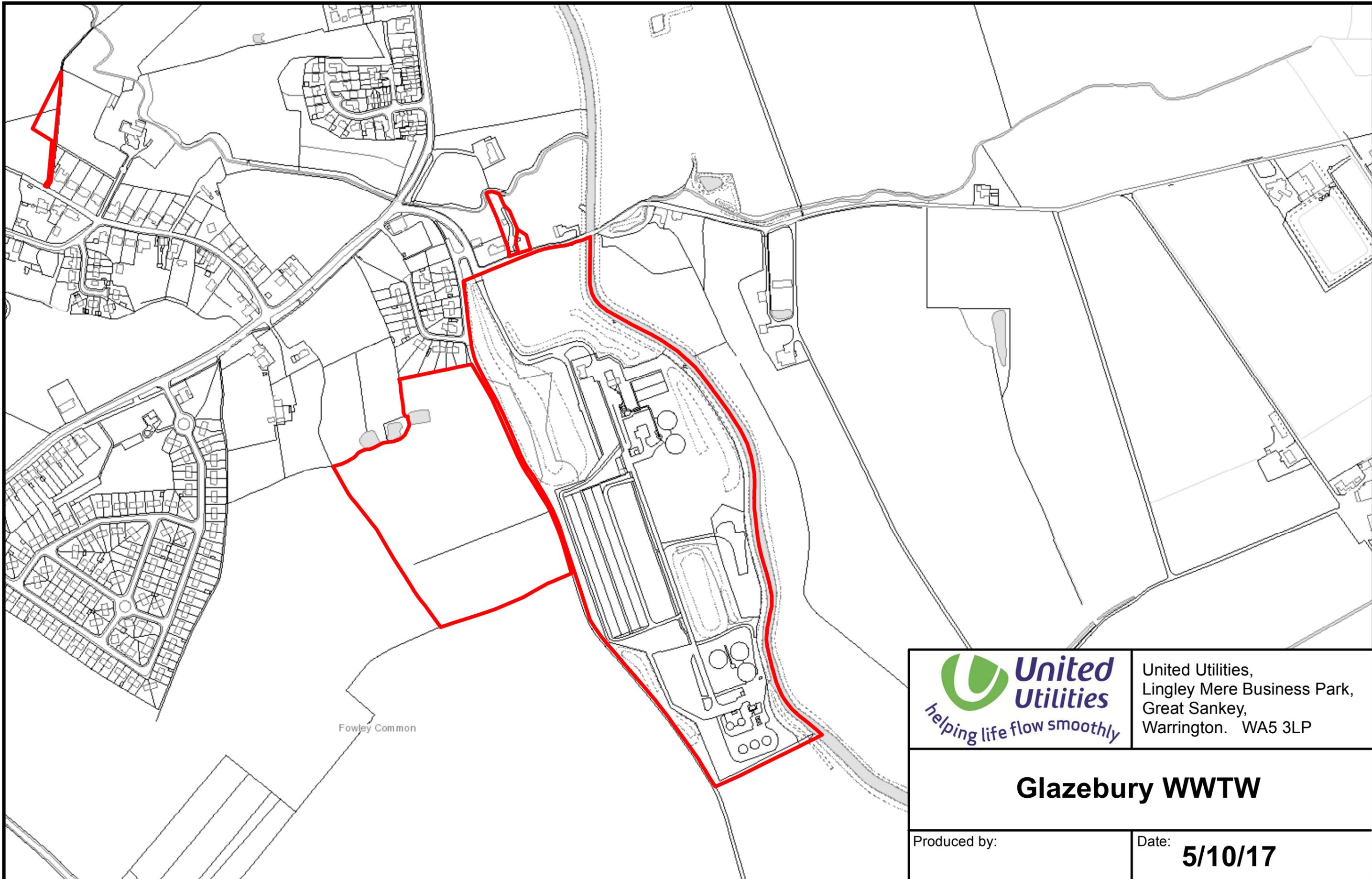
#### **Summary**

Moving forward, we respectfully request that the Council continues to consult with United Utilities for all future planning documents. We are keen to continue working in partnership with Warrington Borough Council to ensure that all new growth can be delivered sustainably, and with the necessary infrastructure available, in line with the Council's delivery targets.

In the meantime, if you have any queries or require further clarification on any of the above matters, please do not hesitate to contact me.

Yours faithfully

Jenny Hope  
Planning Manager  
Developer Services & Planning  
United Utilities Water Limited



United Utilities,  
Lingley Mere Business Park,  
Great Sankey,  
Warrington. WA5 3LP

## Glazebury WWTW

Produced by:

Date:

**5/10/17**

Scale:

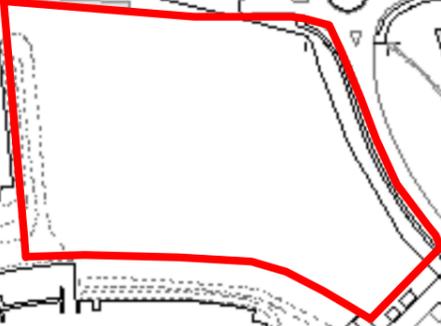
The position of the underground apparatus shown on this plan is approximate only and is given in accordance with the best information currently available.

United Utilities Water will not accept liability for any loss or damage caused by the actual position being different from those shown.

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Coniston Buildings

ORTON BOULEVARD



Lingley Mere

OMEGA BOULEVARD



United Utilities,  
Lingley Mere Business Park,  
Great Sankey,  
Warrington. WA5 3LP

### Land at Lingley Mere

Scale:

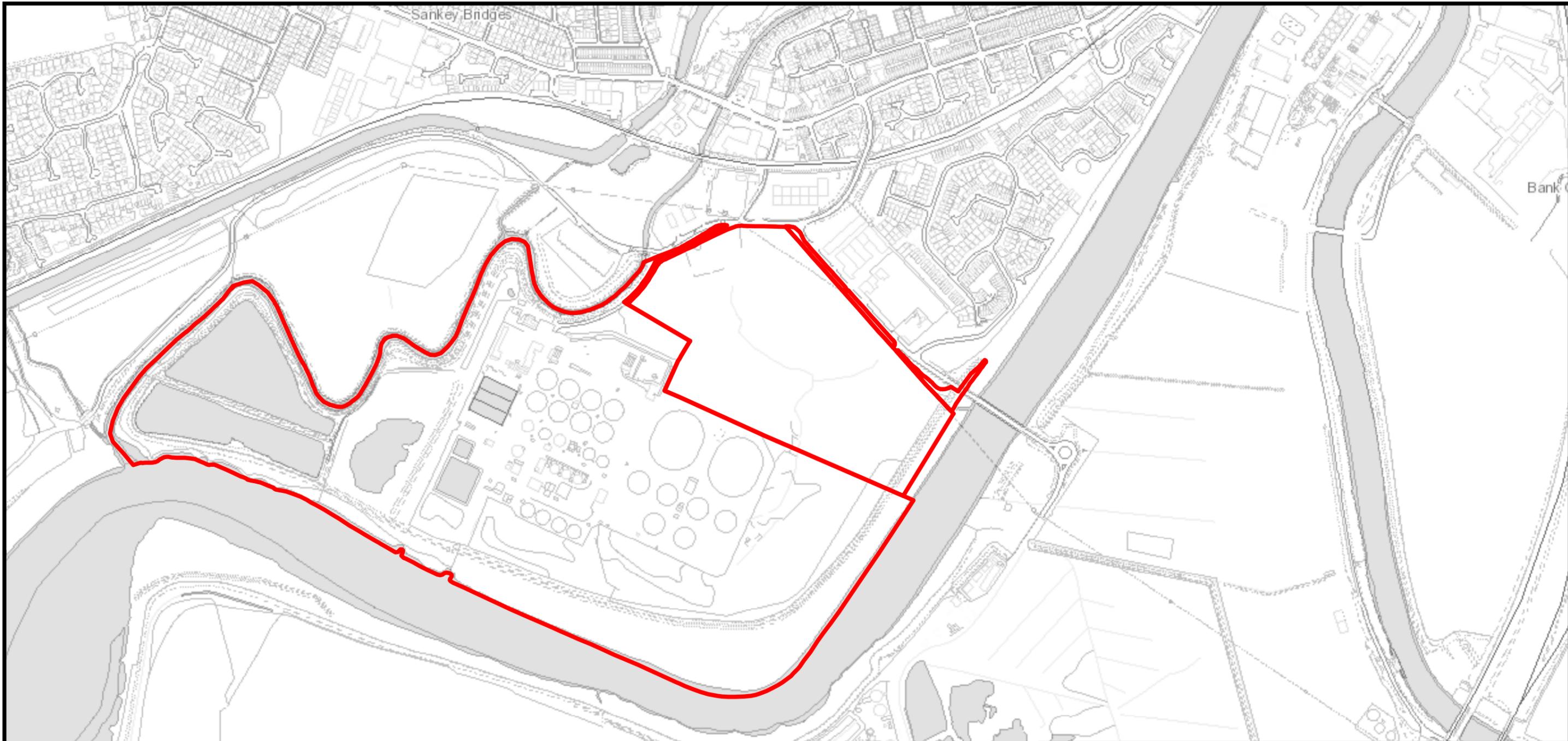
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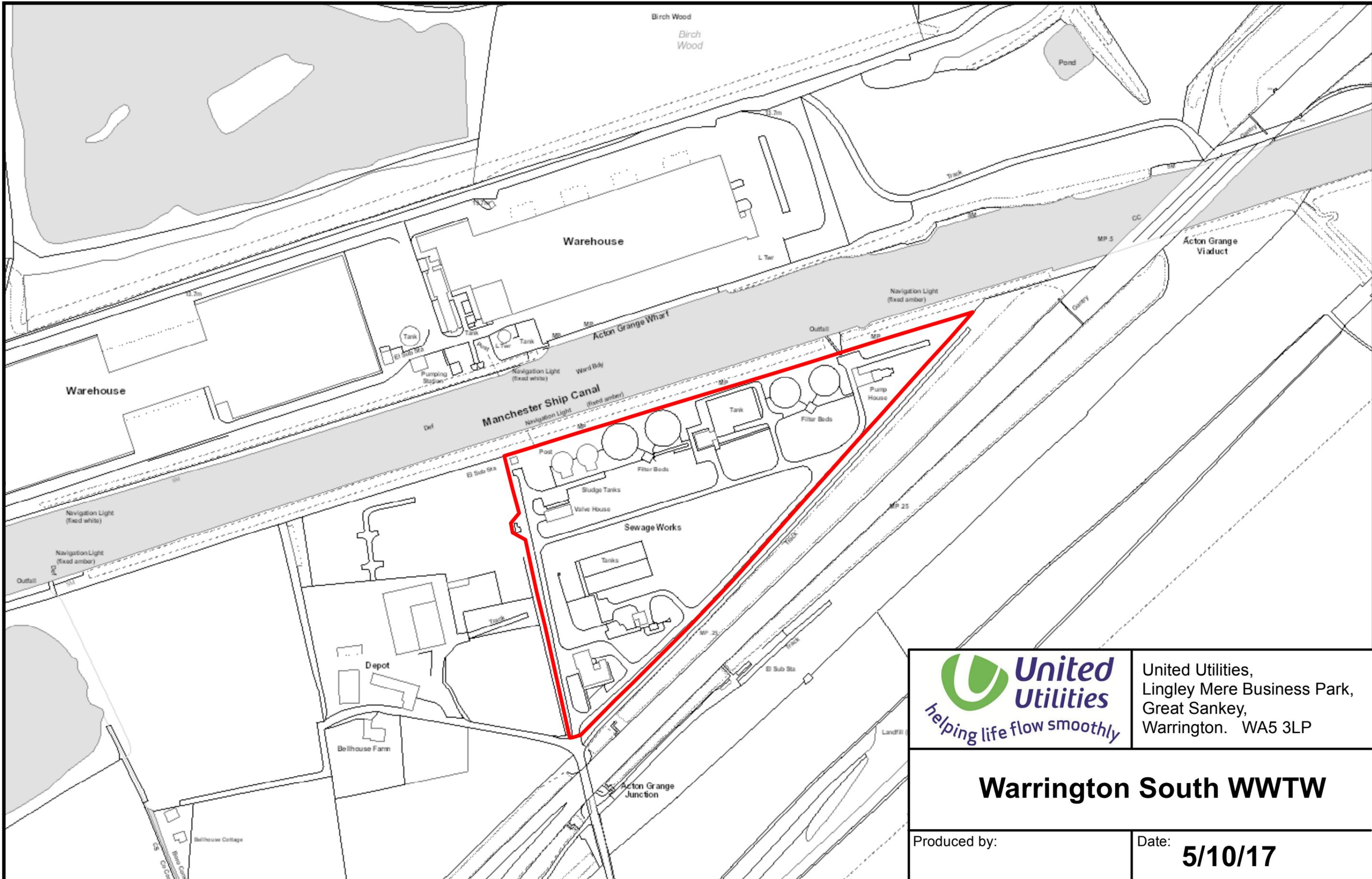
## Warrington North WWTW

Produced by:

Date: **5/10/17**

Scale:

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United Utilities,  
Lingley Mere Business Park,  
Great Sankey,  
Warrington. WA5 3LP

## Warrington South WWTW

Produced by:

Date:

**5/10/17**

Scale:

The position of the underground apparatus shown on this plan is approximate only and is given in accordance with the best information currently available.

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The Coal  
Authority

## Warrington Borough Council Local Plan Review - Preferred Options (Regulation 18)

Consultation Deadline – 12 September 2017

### Contact Details

Planning and Local Authority Liaison Department  
The Coal Authority  
200 Lichfield Lane  
Berry Hill  
MANSFIELD  
Nottinghamshire  
NG18 4RG

Planning Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)  
Planning Enquiries: 01623 637 119

### Date

12 September 2017

## **Warrington Borough Council Local Plan Review - Preferred Options - Regulation 18**

Thank you for your notification received on the 19 July 2017 in respect of the above.

The Coal Authority has provided the LPA with downloadable data for both Surface Coal Resource and Development Risk within Warrington area and would expect any potential site allocations to be assessed against this information in order to ensure that any potential constraints or issues relating to coal mining legacy are identified at an early stage.

In respect of the current document out for consultation the Coal Authority is pleased to see that Paragraph 4.93 of the Preferred Options Document states that the Local Plan will identify MSAs and will seek to safeguard the shallow coal deposit in the area.

The Coal Authority has no other specific comments to make at this stage. However, we wish to be consulted both informally if required and formally on future stages. Please continue to send your emerging planning policy consultations to our generic email address [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk).

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).

Regards

  
**Melanie Lindsley** BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI  
Planning Liaison Manager





Local Plans  
Warrington Borough Council  
New Town House  
WARRINGTON  
WA1 1UH

**Our Ref**  
**If you telephone** Alasdair Cross  
**please ask for** 0151-511-7657  
**Your ref**  
**Date** 28<sup>th</sup> September 2017  
**E-mail address** Forward.Planning@halton.gov.uk

Dear Local Plans Team,

**Warrington Local Plan – Preferred Development Option (Reg 18) Consultation.**

Please find below Halton Borough Council's representations concerning your Preferred Development Options (July 2017) consultation.

Halton has concerns regarding;

1. Employment Land needs
2. Land Supply (SHLAA)
3. Green Belt Assessment
4. Duty to Co-operate
5. Warrington Waterfront
6. Warrington South West Urban Extension
7. Gypsy and Travellers provision
8. Retail
9. Affordable Housing

**1. Employment Land needs**

- 1.1. Halton has concerns regarding the level of employment growth that Warrington is planning for, in so far as it impacts on the Green Belt between Warrington and Widnes/Runcorn.
- 1.2. Warrington appears to be planning for 31,000 jobs in the period 2015~40. This figure is drawn from the Cheshire and Warrington LEP Strategic Economic Plan. This figure appears to be about 33% higher than the average of the 'baseline' economic forecasts commissioned by Warrington.
- 1.3. Halton note that Warrington has recently allowed significant areas of employment land to be lost to residential development (1,100 dwellings on Omega, Gemini 8) and appears to be promoting the loss of further 'city centre' sites to residential use (e.g. Palatine Industrial Estate / southern Centre Park etc). Warrington appears to have insufficient, readily developable land for employment purposes and is resorting to extending Omega into the neighbouring authority of St.Helens and proposing to place a third of its total 'need' in the Warrington Waterfront area, removing the Green Belt gap to Runcorn.
- 1.4. Halton looks forward to working with Warrington colleagues to better understand the justification for this scale of development, why they feel Warrington's growth ambitions warrant the merging of Warrington and Runcorn and why alternative, less sensitive Green Belt areas (such as Barleycastle

**Policy & Resources**

Municipal Building, Kingsway, Widnes, Cheshire WA8 7QF  
Telephone: 0303 333 4300 [www.halton.gov.uk](http://www.halton.gov.uk)

Trading Estate south of the M56) have not been chosen in preference to merging Warrington with Runcorn.

## **2. Land Supply (SHLAA)**

- 2.1. Halton is concerned that by substituting figures from the Urban Capacity Statement (Oct16) with figures from a Warrington and Co. Town Centre Masterplan, Warrington may be at risk of overstating the deliverable and developable supply of urban land.
- 2.2. Halton would like reassurance concerning the suitability and deliverability of these substitutions as any shortfall in the stated supply will likely need to be made up from sites within the existing Green Belt, notably;
  - a) Riverside Retail Park / Wharf Street Industrial Area
  - b) Palatine Industrial Estate
  - c) Warrington Central Trading Estate (Bewsey Road/Dallam Lane)

## **3. Green Belt Assessment**

### Correction

- 3.1. Para 145, the final Green Belt Study report (Oct16) states that “*minor amendments were made to the methodology to account for comments from neighbouring authorities*”, and Para 80 reads “*Prior to being finalised, the parcels and the boundaries used were reviewed with neighbouring authorities and agreed under Duty to Co-operate arrangements*”. Halton supplied comments and raised concerns about aspects of the than proposed Green Belt Study methodology. We have not had any contact with the consultants, nor have we seen any material to say how our, or others’, comments were addressed or why they were discounted. Halton did not see Parcel boundaries until publication of the final report (Oct16).
- 3.2. Halton continues to have significant concerns regarding aspects of the Green Belt Study.

### Comprehensiveness

- 3.3. Warrington’s Green Belt Study has been undertaken in three parts
  - (1) ‘General Areas’ Borough divided into ‘General Areas’ with assessments undertaken.
  - (2) ‘Parcels’, Where General Areas assessed as performed ‘weak’ or ‘moderate’ Green Belt function, smaller parcels identified and assessed
  - (3) Call for Sites - Third stage was undertaken assessing Call for Sites submission sites.
- 3.4. Halton is concerned that this is not a comprehensive approach, with ‘Parcels’ (Stage 2) covering only a *selected* fraction of the General Areas identified as *weak* or *moderate* (Stage 1). Halton can see no justification for this selective approach which fundamentally reduces the usefulness of the study. For instance, with regard to the SWUE proposal, it is limits the ability to compare how this area (closing the green belt gap between Warrington and Runcorn) compares with sites between, for example, Omega North and Burtonwood, or between Culcheth and Croft.
- 3.5. In addition, despite the Green Belt Assessment Addendum being dated June 2017 and the Green Belt Extra Assessments report being dated July 2017, Warrington appears to have not provided an individual assessment for the specific area of Green Belt proposed to be released through the Warrington Waterfront proposal.

Parcel WR65.

- 3.6. This very large parcel is transected by a watercourse (a potential strong green belt boundary) running north south through the middle of the site which would suggest this site should have been dealt with as two separate parcels.

Green Belt Purpose 1: To check the unrestricted sprawl of large built up areas.

- 3.7. Halton maintains its objection (as stated to the proposed methodology) that the assessment for Green Belt *Purpose 1* only considers the development of sites contributing to outward sprawl from Warrington i.e. sites adjoining Warrington town. Given Warrington's location between major conurbations and the existence of built development up to neighbouring authority's boundaries in places, this is an artificial and unjustifiable restriction that undermines the validity of the study. This has potentially skewed the results for sites adjoining Runcorn and Moore.
- 3.8. The '*Justification for the [overall] assessment*' for the individual parcels effectively marks down the contribution to the green belt, of parcels not adjoining Warrington Town where Purpose 1 is scored as 'no contribution'. This has skewed the results for sites adjoining Runcorn and Moore, and undermines the validity of the study.
- 3.9. Halton considers that the assessments against Purpose 1 appear inconsistent in places with some assessments apparently discussing the strengths of boundaries that do not form an existing green belt edge. The assessments for GA14 (Moderate) and R18/ 125-SWUE (Weak) are a case in point.

Green Belt Purpose 2: Prevent neighbouring towns merging into one another

- 3.10. Halton has concerns regarding the Green Belt Study's assessment of remaining gap. It appears in places that the Study has looked simply at the remaining width of the, as currently adopted, Green Belt and disregarded the presence of existing built development (i.e. Moore Village) and the effects of the remaining 'perceived gap' on the ground.

Green Belt Purpose 4: To preserve the setting and special character of historic towns

- 3.11. As stated in our comments about the proposed methodology, Halton question the premise of the assessments under Purpose 4, particularly the identification of 'historic towns' and curious measure of 'views of the Parish Church'.
- 3.12. Halton notes that the assessment chooses only to consider two Conservation Areas to be of significance, Warrington Town Centre and Lymm. Indeed, the Green Belt Study Addendum in relation to parcel WR65 (the SWUE) clarified the issue stating "*Purpose 4 refers to the Walton Village Conservation Area in error. Only Warrington Town Centre and Lymm Conservation Areas are deemed to be relevant to the assessment. Purpose 4 should have been assessed as no contribution*" If conservation areas are considered relevant to the assessment of Green Belt function, Halton do not see the special significance of these two Conservation Areas located in the centre of settlements. Halton can see no justification for ignoring the presence of Conservation Areas elsewhere in Warrington and in neighbouring authorities e.g. Moore Village.

**4. Duty to Co-operate**  
Correction

- 4.1. Para 2.37 of the Preferred Development Option document discussing engagement under the duty to co-operate, states that "*No significant issues were raised during these discussions*". This statement is

inaccurate as regards Halton, with officers having expressly stated at the meeting on the 6<sup>th</sup> April 2017 that Halton would have “*significant concerns regarding any proposals to significantly extend Warrington westwards towards Moore village, not-least as this would impact on Halton’s possible options to address its own development needs*”.

## **5. Warrington Waterfront - Port Warrington**

- 5.1. Halton objects to the proposed Warrington Waterfront proposal as currently drafted and looks forward to working with Warrington to investigate options for retaining a satisfactory gap (both physical and perceived) between the towns of Runcorn and Warrington. Halton’s concerns primarily relate to the Port Warrington element with its resultant removal of the Green Belt between Runcorn and Warrington.

Halton has particular concerns regarding;

- a) Green Belt - Merging of settlements.
- b) Evidence Base - Green Belt Study.
- c) Evidence Base - Highways & Access.
- d) Evidence Base – Need for additional port facilities.
- e) Impact on Halton residents – Promenade Park.
- f) Loss of valuable recreational facility.

### **a) Green Belt – Merging of settlements**

- 5.2. Halton object to the Port Warrington element of the Warrington Waterfront proposal, which results in the merging (physical and perceived) of Runcorn and Warrington contrary to national Green Belt policy.
- 5.3. Halton note that despite the Green Belt Assessment Addendum being dated June 2017 and the Green Belt Extra Assessments report being dated July 2017, Warrington appears not to have provided an individual assessment for the specific area of Green Belt proposed to be released through the Warrington Waterfront proposal. However it is clear that for (Green Belt) Purpose 2 the assessment would be the same as for General Area 15 - GA15, namely.

*“The GA forms an essential gap between the Warrington urban area and Runcorn in the adjacent neighbouring authority of Halton, **whereby development of the whole of the GA would result in the actual merging of the towns.**”*

- 5.4. The Green Belt Assessment Final Report (Oct2016) reviews how a number of other Green Belt Studies have fared at examination, including the following conclusions from the Inspector examining Cheshire East’s Plan [our emphasis];

*50. The Inspector identified several flaws in the overall approach to the Green Belt Assessment, including:*

*There were several cases where the Green Belt assessment does not support the release of specific sites from the Green Belt **and the review appears to have given greater weight to other factors, such as land ownership, availability and deliverability** when preparing and finalising the Plan.*

Halton would suggest that there are clear similarities in Warrington's approach with regard to (Peel's) Port Warrington and South West Urban Extensions sites, particularly sites WR68, WR69, WR70 and WR71 that Warrington's Green Belt study concludes perform a strong green belt function, but are proposed for development.

**b) Evidence Base –Green Belt Study**

- 5.5. As noted above, Warrington appears not to have provided an individual Green Belt assessment for the area proposed to be released for Warrington Waterfront. General Area 15 [GA15] covering Port Warrington, was assessed as having moderate Green Belt function. The Oct16 iteration of the Green Belt work divided General Area 15 (Port Warrington) into six Parcels, and concluded individually that four performed a 'strong' green belt function. Regarding the two parcels assessed as having a weak function, Halton disagrees with the assessment of Purpose 1.

Green Belt Purpose 1

- 5.6. Halton maintains its objection (as stated to the proposed methodology) that the assessment for *Purpose 1: Check unrestricted sprawl* only considers development of sites contributing to outward sprawl from Warrington i.e. sites adjoining Warrington town. Given Warrington's location between major conurbations and the existence of built development up to neighbouring authority's boundaries in places, this is an artificial and unjustifiable restriction.
- 5.7. The '*Justification for the [overall] assessment*' for the individual parcels effectively marks down the contribution to the green belt of parcels not adjoining Warrington where Purpose 1 is scored as 'no contribution'. This has skewed the results for sites adjoining Runcorn and Moore, and undermines the validity of the study.
- 5.8. Halton considers that the assessments against Purpose 1 appear inconsistent in places with some assessments apparently focussing on the strength of boundaries that do not form an existing green belt edge. The assessments for GA14 (Moderate) and R18/ 125-SWUE (Weak) are a case in point.

**c) Evidence Base –Highways and Access**

- 5.9. Warrington has chosen to consult on both the Preferred Development Options and the Warrington Western Link (road proposal) in advance of completing work on its local Transport Model. Whilst Halton has sympathies regarding the need to progress with both projects, the lack of this information and resultant testing of options limits respondents ability to assess potential impacts of the proposals and identify potential problems.
- 5.10. This is particularly the case with the Warrington Waterfront and Port Warrington proposals, where there is no substantive information provided as to how the latter may be accessed.
- 5.11. The Port Warrington proposal extends to some 75Ha, with an additional 25 ha. elsewhere in the wider waterfront area equating to 34% of Warrington's proposed employment land allocations. Warrington is planning for 31,000 additional jobs over the plan period suggesting that up to 10,500 persons may commute into the waterfront area with up to 7,750 being employed at Port Warrington (pro-rata).
- 5.12. Warrington's latest Western Link consultation shows provision for only a single junction to serve Port Warrington on the proposed Western Link road, providing a single point of access from the north.

Halton has serious concerns about the accessibility of the Port Warrington proposal and potential impacts on Moore / Promenade Park;

- How much floorspace is proposed at Port Warrington – 2 million SqFt?
- How many jobs are proposed at Port Warrington?
- How many vessel dockings does Warrington envisage at the port – we note that Peel’s new container vessel has a capacity of 260 TEUs, suggesting 260 HGV movements per docking.
- What level of HGV/staff traffic does Warrington envisage from Port Warrington?
- Is the intention to have only one new access from the north?
- Is one access sufficient for the level of development proposed?
- Is the intention to retain or remove the existing vehicular / pedestrian access across Moore Lane swing-bridge, and what potential impacts has Warrington identified on Moore Village for each option; e.g. rat running, employee parking etc.?
- How will delivery of the northern access road to the Western Link be secured?

5.13. As with our comments to the Western Link consultation, Halton have concerns regarding potential traffic impacts on;

- Runcorn Road, Moore
- Moore Lane
- A56 and A558
- Junction 11, M56
- Mersey Gateway

We look forward to Warrington completing the technical transport work and sharing the results so we have quantitative data to identify any potential problems.

**d) Evidence Base – Need for additional port facilities**

5.14. Halton has not seen any evidence supporting the need for the port development in this location, especially as there are unused port facilities within Runcorn at Weston Docks, and given previous proposals from the Manchester Ship Canal Company were to rationalise port facilities along the Ship Canal.

- What assessment of alternative (non-Green Belt) sites has Warrington undertaken to show the need for a port in this location is justified?
- What assessment of existing and future port capacity has Warrington undertaken to show exceptional circumstances for Green Belt release for this development?
- What steps has Warrington identified to ensure that any development at Port Warrington is truly multi-modal (ship-to-road), and not just general employment?

**e) Impact on Moore / Promenade Park**

5.15. The Port Warrington proposal extends along the north bank of the Ship Canal past the existing residential area of Promenade Park on the south bank within Halton Borough. As the port will obviously have to front directly onto the Ship Canal, there would appear to be negligible opportunity to provide screening of the commercial uses from the residential.

5.16. Halton has a number of concerns regarding the residential amenity of existing residents and would request additional information on;

- Does Warrington envisage 24 hour operation of the port facilities?

- What materials does Warrington envisage the port handling, i.e. containerised traffic, bulk materials (e.g. salt, cement, waste)?
- What sort of goods handling equipment does Warrington envisage being utilised at the port and what nuisance levels does it consider acceptable (i.e. noise, dust, light)?
- What controls will be enforced on open storage of materials?
- What, if any, consideration has been given to the amenity of the existing residential area?

Halton notes that the existing operations in this location utilise a lot of open storage, including the open storage of baled waste.



**f) Loss of valuable recreational resource**

- 5.17. Halton was surprised that Warrington's Port Warrington proposal involves the substantial removal of Moore Nature Reserve.
- 5.18. Halton has the following concerns and would request additional information on;
- What assessment(s) has Warrington undertaken on current recreational use of this site?
  - What assessment(s) has Warrington undertaken on potential displacement of current recreational visits to Moore to more sensitive locations, e.g. Mersey shoreline and resultant negative impacts on the RAMSAR / Special Protection Area?
  - What assessment(s) has Warrington undertaken on impact on Protected Species?

**6. South West Urban Extension (SWUE)**

- 6.1. Halton wishes to object to the proposed South West Urban Extension (SWUE) as currently proposed and looks forward to working with Warrington to investigate options for retaining a satisfactory Green Belt gap (physical and perceived) between the towns of Runcorn and Warrington.

Halton's wishes to raise concerns regarding;

- (4) Green Belt - Merging of settlements
- (5) Evidence Base - Green Belt Study
- (6) Evidence Base - Highways & Access
- (7) Bridgewater Canal Marina

**a) Green Belt – Merging of settlements**

- 6.2. For GA14 (SWUE) Warrington's Green Belt Study concludes;

*“Moderate contribution: The GA forms a **largely essential gap** between the Warrington urban area and Runcorn in the adjacent neighbouring authority of Halton, whereby a reduction in the gap would significantly reduce the actual distance between the towns **but would not result in them merging**. Overall the GA makes a moderate contribution to preventing towns from merging.*

- 6.3. Halton disagrees with this assessment / conclusion. It seems clear Warrington’s consultants have had regard to the remaining distance of the *adopted* Green Belt to Runcorn, apparently ignoring the presence of Moore Village and the ribbon development creating a near unbroken line of development from Sandymoor, through Moore, Warrington’s South West Urban Extension, to Walton, Stockton Heath and Grappenhall. Warrington’s proposal as drafted would essentially lead to constant development along the Ship Canal from the Weaver Navigation to the Thelwall Ferry.
- 6.4. These conclusions / outcome are regardless of any proposals Halton may produce for land around Moore village in its own emerging Local Plan.

**b) Evidence Base –Green Belt Study**  
Parcel WR65.

- 6.5. This very large parcel is transected by a watercourse (a potential strong green belt boundary) running north south through the middle of the site which would suggest this site should have been dealt with as two separate parcels.

**c) Evidence Base –Highways and Access**

- 6.6. Warrington has chosen to consult on both the Preferred Development Options and the Warrington Western Link (road proposal) in advance of completing work on its local Transport Model. Whilst Halton has sympathies regarding the need to progress with both projects, the lack of this information and resultant testing of options limits respondents ability to assess potential impacts of the proposals and identify potential problems.
- 6.7. As with our comments to the Western Link consultation, Halton have concerns regarding potential traffic impacts on;
- Runcorn Road, Moore
  - Moore Lane
  - A56 and A558
  - Junction 11, M56
  - Mersey Gateway

We look forward to Warrington completing the technical transport work and sharing the results.

**d) Bridgewater Canal Marina**

- 6.8. Peel Holdings have previously identified a need for additional marina facilities on the Bridgewater Canal in the wider Runcorn area. Previously Halton had identified a broad location within the Daresbury Strategic Site (Policy CS11: East Runcorn), but this site appears to have unresolved technical deficiencies.
- 6.9. As Peel are the promoter of Warrington’s SWUE (Call for Sites – Dec16) Halton is surprised at the omission of a marina from the SWUE proposals and therefore request that consideration be given to the inclusion of a canal marina as part of the SWUE (as amended).

## 7. Gypsies & Travellers

7.1. The location of provision for Gypsies and Travellers in Warrington is largely not a concern for Halton, however Halton is somewhat concerned that Warrington's initial approach is to simply allocate three existing unauthorised sites within the current Green Belt as this approach provides encouragement for the establishment of further such unauthorised green belt encampments in neighbouring authorities.

## 8. Retail

8.1. Warrington officers have indicated that additional work will be undertaken to fully quantify the level of additional retail floorspace that Warrington will plan for. This work will account for the elevated housing and hence population numbers, being promoted.

8.2. Halton note, that despite identifying additional (net) retail requirement, it is unclear where Warrington intends to accommodate this need, with the City Centre Masterplan (Figure 4) apparently proposing the redevelopment of a number of existing retail sites;

Existing Retail Location	City Centre Masterplan
Riverside Retail Park	Residential Development
DFS (Mersey Street)	Mixed Use Development
Iceland (Crossfield Street)	Bank Quay station parking
Dunelm Mill (Parker Street)	Bank Quay station parking
Go Outdoors (Wilson Patten Street)	Mixed Use Development
Sainsbury's (Church Street)	(Site divided) Mixed Use Development
Cockhedge Centre	(Site divided) Mixed Use Development
Pinner's Brow Retail Park	Mixed Use Development

8.3. Halton has concerns about the potential scale of Warrington's 'city centre' ambitions as previous retail studies have identified that Warrington Town Centre draws significant expenditure from within Halton. Halton therefore reserves its position pending the outcomes of further research and clarification from Warrington concerning the scale and location of future retail provision.

## 9. Affordable Housing

9.1. Whilst unlikely to be a cross-boundary issue affecting Halton, officers are surprised that Warrington has not included any mention of affordable housing, especially at this was the element of the previous Plan that was quashed by the High Court, precipitating the current Plan.

## 10. Conclusion

10.1. Halton looks forward to working with colleagues in Warrington going forward to address the above issues.

Yours sincerely

Alasdair Cross  
Principal Officer – Planning & Transport Strategy



# WARRINGTON

## Borough Council

Professor Steven Broomhead  
Chief Executive

Mr A Cross  
Principal Officer-Planning & Transport  
Strategy  
Halton Borough Council  
Municipal Building  
Kingsway  
Widnes  
WA8 7QF

Andy Farrall  
Executive Director  
Economic Regeneration, Growth and Environment

Town Hall  
Sankey Street  
Warrington  
WA1 1UH

25<sup>th</sup> August 2017

Dear Mr Cross

### **LOCAL PLAN PREFERRED DEVELOPMENT OPTION CONSULTATION**

Further to our recent 'Duty to Co-operate meeting' on Monday 21<sup>st</sup> August, we recognise the importance and benefit of a further meeting to discuss the Council's South West Urban Extension and the potential implications this may have for Halton Borough Council.

I can therefore confirm that the Council is willing to receive a formal response from Halton Borough Council after the close of the consultation period (12<sup>th</sup> September 2017- 5pm).

We would be grateful if a formal response could be provided by Friday 29<sup>th</sup> September 2017.

Yours sincerely

Michael Bell  
Planning Policy & Programmes Manager

Planning Policy & Programmes  
Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
Cheshire  
WA1 2NH

**Our ref:** SO/2006/000276/CS-05/PO1-L01

**Date:** 27 September 2017

Dear Sir/Madam

**Warrington Local Plan  
Preferred Development Option, Regulation 18 Consultation, July 2017**

Thank you for referring the above document to the Environment Agency for consultation. We would like to make the following comments:-

**Gypsies and Travellers**

We wish to be consulted on the proposed arrangements for disposal of foul and surface water drainage, prior to removing the Pennington Lane, Collins Green site from the Green Belt and formally allocate it as a permanent Gypsy and Travellers site.

**Preferred Development Option**

The preferred development options in the local plan have the potential to impact several watercourses, ponds, wetlands, local wildlife sites and the priority native species that inhabit these important habitats (e.g. Moore Nature Reserve). As part of any development proposal, we would expect to see these important habitats conserved and enhanced for the species that depend on them. The National Planning Policy Framework (NPPF), paragraph 109, recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on nature conservation and providing net gains in biodiversity where possible. This contributes to the Government's commitment to halt the overall decline in biodiversity by establishing coherent ecological networks that are more resilient to current and future pressures. Article 10 of the Habitats Directive stresses the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way and such networks and corridors may also help wildlife adapt to climate change.

**Next Steps**

Once the options are agreed, then further consultation should take place on the site specific projects, to identify threats to the water environment (WFD status), opportunities for improvement and appropriate mitigation measures put in place. This

Environment Agency  
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

should be picked up in the Habitats Assessment, which is indicated as one of the next steps.

I hope these comments are useful to you and I look forward to consultation on further local plan documents.

Yours faithfully

**Ms DAWN HEWITT**  
**Planning Advisor**

Direct dial 02030250535

Direct e-mail [dawn.hewitt@environment-agency.gov.uk](mailto:dawn.hewitt@environment-agency.gov.uk)



Our ref: SP/SP7/F/ii  
Date: 29/09/2017

**Planning & Sustainable Development**  
First Floor, Westfields  
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CREWE  
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Dear Sir/Madam,

### **Preferred Development Option Regulation 18 Consultation**

Cheshire East Council (CEC) welcomes the opportunity to comment on the Preferred Option Consultation for Warrington's new Local Plan and provides below comments on four aspects of your proposal:

- 1) Overall Scale of Development** - CEC notes Warrington Borough Council's (WBC) approach to assessing its development needs and in addition the proposed additional growth derived from Cheshire & Warrington Local Enterprise Partnership's Strategic Economic Plan. It is likely that Warrington will have to apply the new approach towards setting its housing figure that the government eventually decides upon following its current consultation *Planning for the right homes in the right places*;
- 2) Spatial Distribution Options** – CEC notes and supports Warrington's objective to maximise development within the existing urban area through regeneration in the town centre, Warrington Waterfront and the wider inner Warrington area. The Council would wish to see a more detailed explanation of why the planning constraints to the north of Warrington are so significant to prevent a more geographically even distribution of the remaining development requirement than that identified in the Preferred Option;
- 3) Commuting and Migration information** – CEC would wish to have more information on the potential changes to commuting and migration flows, particularly as they relate to Cheshire East, from the preferred development option and greater clarity on their likely consequences for the transport infrastructure and networks within Cheshire East;
- 4) Cross Border Transport Impacts & Modelling** – CEC considers there is a need for wider highway modelling to understand strategic cross border impacts. This could require a potential Memorandum of Understanding to agree how this will be undertaken and how the findings can be delivered. Further detailed comments on this aspect are provided below.

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The Council shares a boundary with Warrington along the A50 corridor, which includes the parishes of High Legh / Millington, and the A56 corridor through Little Bollington. The Council has reviewed the transport evidence base that supports the proposals, namely the report entitled 'Warrington Transport Summary 2017'.

This report is described as providing 'An initial overview of transport in Warrington to identify existing problems and opportunities for improvement'. The report does little to quantify the impact of development proposals on the transport network especially in regard to areas outside of Warrington Borough; it is essentially an inward looking document.

To meet on-going Duty to Co-operate requirements, the Council will require a more detailed assessment of the cross boundary impacts resulting from WBC spatial options and proposals. A strategic assignment tool such as SATURN should be used to determine the predicted impact of new developments and the results used to influence policy choices – such as investment in cross boundary public transport services.

Without this evidence, it is considered that the Preferred Development Option may have significant cross boundary transport impacts, particularly on the A50 corridor and surrounding country lanes. These impacts could be mitigated through policies to support the provision of new and improved public transport services and measures to review the need for traffic management measures on cross boundary minor roads – such as Swineyard Lane.

However, as the supporting transport information to quantify that impact is not currently available, we reserve our position on this issue at this stage.

It is considered that the following actions are required to address CEC's transport concerns:

- A Strategic Transport Model is used to determine the predicted impact of Warrington's Preferred Development Option on cross boundary routes;
- Subject to the outcome of this modelling work, to include relevant criteria in the policy framework supporting the Garden City Suburb proposal that requires appropriate future enhancement of cross boundary transport;
- To include policies that ensure the future review and funding of traffic management measures on minor cross boundary routes; and
- To explore the need for an MOU.

Please get in touch if you would like to discuss any of the above prior to our next Duty to Co-operate meeting.

Yours sincerely,



**Stuart Penny**  
**Planning Policy & CIL Manager**

OFFICIAL



Historic England

ldf@warrington.gov.uk

Our ref: PL00044906

Your ref:

Date: 29 September  
2017

Dear Sir

### **Warrington - Local Plan Preferred Development Option**

Thank you for consulting Historic England about the above document. This response details the expectation of the Preferred Development Options for Warrington and the intention for a proposed new Local Plan as indicated in the report (Para 2.33).

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

Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (<http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) may be useful in the production of your Plan.

The Local Plan for Warrington will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW

Telephone 0161 242 1416 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Correspondence or information which you send us may therefore become publicly available.



## Evidence base

A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. The evidence base needs to identify:

- What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities;
- What issues and challenges it is facing and likely to be facing in the future;
- What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area.

When undertaking this exercise, it is important to bear in mind that it is not simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the Borough and its local distinctiveness and character which can easily be lost. There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being discovered in the future. It may also be necessary to identify heritage assets outside the Council's area where there are likely to be setting impacts caused by any development proposals put forward in the area. It is also important to bear in mind that some asset types are not currently well recorded. For example, the Register of Parks and Gardens of Historic Interest in England, is thought to represent only around two thirds of sites potentially deserving inclusion. Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a local list.

Potential sources of evidence include:

- National Heritage List for England
- Historic Environment Record
- Conservation Area Appraisals and Management Plans
- Local Lists
- National and Local Heritage At Risk Registers
- Historic Characterisation Assessments
- World Heritage Site Management Plans
- In house and local knowledge expertise

Where the evidence base is weak, the Council will need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan.

## Spatial Portraits

The Local Plan should include a proper description and assessment of the historic environment in the Borough and the contribution it makes to the area (NPPF, Paragraph 169). The Plan needs to describe the historical growth of the area and identify its historic environment. It should also clearly identify the different places their character and identity and the contribution it makes to all aspects of life in Warrington.



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## Strategic Objectives

The report (page 18) sets out the new objectives for the Local Plan, which do not make reference to the historic environment. To contribute to ensuring that the Plan sets out a positive strategy for the conservation, enjoyment and enhancement of the historic environment as required in the NPPF, Objective W5 should be amended to make reference to it.

In view of this, Historic England is concerned, using the evidence provided that the assessment criteria which have been developed using the new strategic objectives, will not allow for any assessment of the historic environment for the options put forward within the report. As mentioned above, Objective W5 lacks any reference to the historic environment and Assessment Criteria W5 only refers to character implications. Therefore, in view of this we cannot see how the Plan will deal with the requirements of the NPPF and primary legislation on matters in relation to the historic environment.

## Local Plan Policies

One of the twelve principal objectives of planning under the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations (NPPF, Paragraph 17). Conservation means maintaining what is important about a place and improving this where it is desirable. It is not a passive exercise. It requires a Plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness.

### Strategic policies

Local Plans should include strategic policies to conserve and enhance the historic environment of the area and to guide how the presumption in favour of sustainable development should be applied locally. It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and any Neighbourhood Plans that come forward are required to be in general conformity with the strategic policies of the Local Plan.

The strategic policies for the historic environment will derive from the overall strategy to deliver conservation and enjoyment of the area's heritage assets for generations to come. These may be policies that concern themselves specifically with the development of types of heritage asset. But delivery of the NPPF objective may also require strategic policies on use, design of new development, transport layout and so on. Indeed every aspect of planning conceivably can make a contribution to conservation. Plan policies in all topics should be assessed for their impact on the strategic conservation objective.

Conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF objectives. The Local Plan should also consider the role which the historic environment can play in delivering other planning objectives:

- Building a strong, competitive economy
- Ensuring the vitality of town centres



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- Supporting a prosperous rural economy
- Promoting sustainable transport
- Supporting high quality communication infrastructure
- Delivering a wide choice of high quality homes
- Requiring good design
- Protecting green belt land
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Facilitating the sustainable use of minerals

In formulating the strategy it is advisable and often necessary to consider the following factors:

- How the historic environment can assist in the delivery of the vision and the economic, social and environmental objectives for the plan area;
- How the Plan will address particular issues identified during the development of the evidence base including heritage at risk;
- The interrelationship between the conservation and enhancement of the historic environment and the other Plans policies and objectives;
- The means by which new development in conservation areas and within the setting of heritage assets might enhance or better reveal their significance;
- How local lists might assist in identifying and managing the conservation on non-designated heritage assets;
- How the archaeology of the Plan area might be managed;
- How CIL funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified;
- Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed;
- What implementation partners need to be identified in order to deliver the positive strategy;
- What indicators should be used to monitor the effectiveness of the strategy.

#### Development Management Policies

In terms of development management policies, it is clear that the NPPF expects plans to include detailed policies, which will enable a decision maker to determine a planning application.

The Local Plan for Warrington should include specific policies for the historic environment in order to help inform decisions that affect it and others should where possible cross-reference heritage related issues.

Key issues to be considered are (not wholly comprehensive):

- Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc).



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- Designated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc).
- Archaeology including remains of less than national importance.
- Conservation areas
- Registered parks and gardens
- Heritage at Risk
- Important views and vistas
- Landscape character
- Local character and distinctiveness
- Individual settlements
- Historic shopfronts and advertisements
- Public realm
- Design
- Information to accompany an application.

### Strategic Cross Boundary Issues

Strategic cross boundary issues that affect the historic environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues listed below, this is not an exclusive list and strategic issues will have to be considered on an area by area basis.

- extensive designated and non-designated heritage assets, e.g. World Heritage Sites, historic landscapes,
- major heritage based tourism attractions, the management of which may impact upon more than one Authority
- major quarries for building and roofing stone, e.g. Portland stone
- major changes to green belt which affect the preservation of the setting and character of historic towns
- major development proposals likely to affect important heritage assets in a neighbouring authority, e.g. major urban extensions, infrastructure proposals

These strategic issues will not necessarily and always be the same as the strategic policies for the protection and enhancement of the historic environment included in a Local Plan but are likely to be a sub-set of them. Indeed local circumstances may indicate that strategic approaches may not always be needed.

### Site Allocations and the Preferred Development Option consultation

The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.



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Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate:

1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution.
2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets.
3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level.
4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset?

The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.

The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.

Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.

The Preferred Development Option Regulation 18 consultation (July 2017) defines the development needs of the area and puts forward sites which the Council is putting forward as their preferred areas for growth and development. In identifying these sites, it is expected that the Council will have undertaken a robust assessment to understand the impact of these sites/areas of growth will have on the historic environment. There is no evidence that this has been undertaken.

Stage 3 of the process (Page 20 of the report) outlines the process that the Council took to assess the spatial options to understand where this can take place. In order to inform the



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options appraisal process, the Council has prepared Area Profiles for the individual parts of the main urban areas and for each of the outlying settlements. These documents do not contain an assessment of the historic environment. The tables refer to the number of assets that are within or adjacent to the site but there is no assessment of these assets. Whilst this can be a useful starting point in the process in helping to identify assets, there does need to be an assessment undertaken of the impact that the sites may have on the historic environment and heritage assets including their setting.

Stage 4 of the process assesses options for the main development locations. For example the SWUE assessment proformas including the Areas Profiles and Technical Paper do not contain any assessment of the impact that the sites will have on the historic environment. It mentions some types of assets but does not undertake any assessment. The other comments in this letter should also be read in conjunction with this.

The summary of the High Level Spatial Options Assessment determines that Option 2; A Garden City Suburb of approximately 6000 homes and an urban extension to the south west of Warrington of up to 2000 homes performed best when assessed against the strategic plan objectives, taking into account the results of the SA/SEA. However, we cannot find any evidence to demonstrate that there has been an assessment of the impact on the historic environment.

These comments should also be applied to the Employment Land locations included within Section 4 of the report.

These comments should also be applied to the sites being allocated for Gypsies, Travellers and Travelling Show-people (Table 10 of the report).

In terms of minerals and waste the content of this letter also applies. In addition, there will be a number of key issues which the Plan will need to address:

#### Minerals

- The Plan will need to demonstrate how it will deliver a steady supply of minerals whilst still safeguarding those elements that contribute to the significance of the heritage assets of the area.
- The Plan will need to show how the scale of future mineral provision is based upon a robust assessment of the likely impacts which the level of extraction proposed might have upon the environment. In this respect, it needs to examine to what extent the assessed demand for the area's mineral resources are capable of being met whilst still safeguarding its historic assets.
- The Plan needs to ensure that the strategy for minerals development and in particular, the location identified for future extraction are delivered in a manner which safeguards those elements which contribute to the significance of the heritage assets of the Warrington area.
- The Plan needs to demonstrate how it will ensure that the after use strategy for minerals sites safeguards the historic environment. This will require a strategic approach to restoration which sets out an effective and co-ordinated after use strategy.

#### Waste



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- The Plan needs to ensure that the strategy for waste management and in particular, the locations identified for future waste developments are delivered in a manner which safeguards those elements which contribute to the significance of the heritage assets in Warrington.
- The Plan needs to show how encouraging the reuse or adaptation of existing buildings might assist in reducing the amounts of construction and demolition of waste. This can include exploring how it can include appropriate policies to encourage the reuse of existing buildings (rather than simply allowing them to be demolished and the site redeveloped).
- Consideration should also be given to the encouragement of the development of appropriate facilities for the re-use of demolition waste particularly where these might help facilitate the repair of the area's historic buildings.

The Report (Chapter 5) summarises the Council's overall approach to the Preferred Development Option for Warrington New City and the evidence base contains studies and master-planning which the Council states confirms that they are able to accommodate the level of growth required and to provide additional detail relating to infrastructure requirements, constraints and important development principles. We can find no evidence that any assessment has been undertaken for any of the sites to inform their suitability for development of the historic environment. For example, the document for the SWUE titled SWUE Framework Plan Final June has one page which maps out the historic assets in relation to the proposed site but there is no evidence to inform the conceptual site layout shown.

As outlined in this letter, the Plan needs to demonstrate how the sites can be developed without harm to the historic environment, heritage assets and their setting. We would expect a robust assessment to be undertaken for each of the sites. Other sites may provide opportunities of the historic environment, for example the WWDA includes a Grade II\* heritage asset (Transporter Bridge) which is currently on the Heritage at Risk Register. The Plan would provide an opportunity to tackle this asset and remove it from the Register. Similar opportunities also exist for the conservation areas within the town centre which are currently on the Conservation Areas at Risk Register.

Historic England strongly advises that you engage conservation, archaeology and urban design colleagues to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the Local Plan, the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER (formerly SMR). They will be able to provide you with the Historic Environment Records for the area including any relevant studies, and ensure a joined-up and robust approach is undertaken.

Finally, we should like to stress that this opinion is based on the information provided by you with your email of 18<sup>th</sup> July 2017. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, this would have an adverse effect upon the historic environment.



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Historic England would welcome the opportunity to work with you on the Plan for Warrington and look forward to hearing from you.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



**Emily Hrycan**  
**Historic Environment Planning Adviser (North West)**

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**From:** [Bell, Michael](mailto:Michael.Bell@sse.co.uk)  
**To:** [LDE](#)  
**Subject:** FW: REPRESENTATIONS ON BEHALF OF SSE PLC TO THE LOCAL PLAN REVIEW - PREFERRED DEVELOPMENT OPTION CONSULTATION DOCUMENT (JULY 2017)  
**Date:** 28 September 2017 12:04:58  
**Importance:** High

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**From:** Geoff Bullock [mailto:gb@dwdllp.com]  
**Sent:** 27 September 2017 18:08  
**To:** Bell, Michael  
**Subject:** REPRESENTATIONS ON BEHALF OF SSE PLC TO THE LOCAL PLAN REVIEW - PREFERRED DEVELOPMENT OPTION CONSULTATION DOCUMENT (JULY 2017)  
**Importance:** High

Dear Mr Bell,

**REPRESENTATIONS ON BEHALF OF SSE PLC TO THE LOCAL PLAN REVIEW - PREFERRED DEVELOPMENT OPTION CONSULTATION DOCUMENT (JULY 2017)**

-

I write on behalf of SSE PLC ('SSE') to make representations to the Local Plan Review - Preferred Development Option Consultation Document (July 2017).

SSE is the owner and operator of the 2,000-megawatt Fiddlers Ferry coal-fired Power Station, including adjoining land to the east and, notably, the ash lagoons to the south.

The Preferred Development Option Consultation Document (July 2017) makes the following statement about the Fiddlers Ferry Power Station:

*"3.6 The Council is aware that Fiddlers Ferry power station may come forward for development during the Plan Period. It currently remains an operational coal-fired power station with ash processing operations but its long-term future remains uncertain. It may be that the site will continue to be used for power generation but the site could represent a major future brownfield redevelopment opportunity. There is not currently sufficient certainty for it to be allocated as a development site, but given the scale of the site, this will need to be kept under review and the site's future has been taken into account in the Council's approach to flexibility of land supply and safeguarding..."*

SSE is broadly supportive of this statement and the Council's recognition that the Power Station remains an operational site and that it may continue to be used for power generation in the future. However, SSE would wish to see Policy PV2 of the Local Plan Core Strategy, which relates to Fiddlers Ferry, amended so that it is not only consistent with the above statement but also provides for a greater flexibility at Power Station site. In particular SSE considers that Policy PV2 should take account of the following factors:

- The existing Power Station is likely to continue operating into the next decade, with Government energy policy putting pressure on cessation of coal power by 2025.

- The decommissioning and demolition of the existing Power Station would take a number of years to complete.
- The existing ash processing activities at the site are expected to continue beyond the coal power station's life span given the current market demand for ash until the existing deposits are fully depleted.
- The site is ideally suited to power generation, being connected to the National Grid, having rail and road transport links, benefiting from a supply of cooling water and having a skilled workforce.
- Were a new power plant to come forward at the site in the future, this is likely to have a much smaller footprint than the existing Power Station, potentially freeing up land for power-related and other employment development.
- The site has the potential to be a major focus for employment and economic activity linking with other initiatives within the area, including the Widnes Waterfront regeneration area.
- In order to fulfil its potential, it will be crucial that surrounding developments and initiatives do not unduly constrain power generation development opportunities at the site.

I trust that these representations will be taken into account. SSE looks forward to engaging further in the Local Plan review process and reserves the right to make further representations as appropriate.

I would be grateful if you could confirm receipt of these representations.

Yours sincerely

Geoff Bullock (on behalf of SSE Plc)

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