

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  
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Customer services line: 03708 506 506  
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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**