

BERRYS

PROPERTY | BUSINESS | PLANNING

Beech House
Anchorage Avenue
Shrewsbury Business Park
Shrewsbury, Shropshire
SY2 6FG

Tel: 01743 271697
Fax: 01743 271753

shrewsbury@berrys.uk.com
berrys.uk.com

Planning Policy Manger
Warrington Borough Council
New Town House
Buttermarket St
Warrington
WA1 2NH

Our Ref: SA28276/HH
Date: 28th September 2017

Dear

Consultation on Preferred Development Option

In relation to the above consultation, I attach a response on behalf of Walton Parish Council. An electronic copy has also been sent by email to LDF@warrington.gov.uk.

The Parish Council welcome further engagement with yourself on the emerging Local Plan, and trust you will take their comments on board as you progress to the next stage of the process.

Yours sincerely,

For and on behalf of Berrys

Email:
Direct
Mobile



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WARRINGTON
Borough Council

Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Response from Walton Parish Council

September 2017

Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

Employment land needs

The economic analyses by BE Group, the Local Enterprise Partnership and Warrington Borough Council pre-date the major changes that are likely as a result of Brexit. There is currently no economic analysis available that considers the implications of Brexit. However Brexit is likely to have a considerable impact on the nation and the borough's economic position particularly in the timeframe of this plan. **WBC needs to give a commitment to undertake new economic analyses that reflect Brexit, and to reflect the results in their final Local Plan.**

Housing needs

The Council states in paragraph 2.10 of its Preferred Development Option that it will keep its housing needs under review in the context of the expected introduction of a standard methodology by the Government. This anticipated new methodology was published by the Government for consultation on 14th September, the final version of which will come into effect on 31st March 2018. The new methodology should be reflected by the Council in its Final Plan.

Under the Government's proposed methodology for calculating housing needs, the DCLG forecast average household growth for Warrington over 2017-2027 would be used as the basis for the calculation, adjusted by a multiplier that is based on the local affordability ratio. Using the published household projections in DCLG table 406 for 2017-2027 (which are only available rounded to the nearest thousand) we calculate that average household growth would be around 800 dwellings per annum, with a multiplier of +12.9% based on the 2016 Warrington affordability ratio of 6.06 (median house prices over median earnings). This results in a housing requirement of around 903 homes per annum, which is 50 homes per annum (1,000 homes over 20 years) lower than the Council's current assessment.

Walton Parish Council urges Warrington Borough Council to reconsider its housing needs in light of the Government's standard methodology and reduce it accordingly by at least 1,000 homes to reflect the new national methodology. This reduction will enable the Council to protect Warrington's separate identity from Halton and preservation of the Green Belt gap between the two towns by dropping its proposals for a south-west urban extension.

Relationship between employment and homes

The Preferred Development Option increases housing need from 955 homes per annum (paragraph 2.8 of that document) to 1,113 homes per annum to support the jobs growth proposed in the Cheshire & Warrington devolution bid. The Parish Council challenges this assumed growth as an over-optimistic aspiration that will harm the character of Warrington.

While the Government's proposed methodology allows Councils to increase their housing figure to reflect economic growth, **Warrington Borough Council should consider the results of new economic analyses that reflect Brexit when finalising their housing needs figure.**

Homes and employment should be closely related geographically, to reduce commuting distances and congestion. **To reflect the fact that the majority of employment opportunities are on the north side of the river, the majority of homes should be directed to the north side of the river, to reduce the need to travel.**

Question 2

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

No comments at this stage, but we reserve our right to comment at Final Plan stage.

Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

The amount of Green Belt to be released is directly linked to the amount of housing and employment land needed; please see our response to question 1.

Question 4

Do you agree with the new Local Plan Objectives?

A missing objective is that Warrington should maintain its unique identity by **not** merging with any neighbouring towns.

Such an objective helps the plan meet the test of being 'consistent with national policy' as one of the key purposes of the Green Belt is to prevent neighbouring towns merging into one another. We suggest the following additional objective:-

To promote and maintain the unique identity of Warrington by ensuring that the existing Green Belt is maintained where it prevents the merging of Warrington with any other town.

Objective 1 seeks the transition of Warrington to a New City. To achieve this requires linking outlying settlements to Warrington as a growth point, both functionally and spatially. The 'hub and spoke' concept works well for other cities, where outlying settlements are connected to the City to their mutual benefit. We suggest that the Council grasp this nettle and reflect it in an amended objective W1 that actively seeks stronger physical links between the outlying settlements and the emerging City.

The Government's new housing methodology comes into force on 31st March 2018 and the Local Plan is not likely to complete its examination and be adopted until 31st March 2019. It would therefore be more appropriate to use 2019 as the base date for the Plan. This also avoids having a backlog against which the Borough Council will be assessed.

To address the above two points, we suggest the following changes to Objective W1:

W1 To enable the transition of Warrington from a New Town to a New City through the ongoing regeneration of inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods including developments that join the outlying settlements to the City whilst:

- *Delivering a minimum of 22,260 new homes (equating to 1,113 per year) between 2017-2019 and 2037-2039; and*
- *Supporting Warrington's ongoing economic success by providing 381 Hectares of employment land between 2017-2019 and 2037-2039.*

Objective 2 as currently framed describes an action to achieve objective W1, rather than an objective in itself. This is inappropriate as a strategic objective to guide the Plan's policies. We suggest that the objective be re-framed to reflect the objective of ensuring any release of Green Belt is sensitive and does not harm the five purposes of the Green Belt as set out in paragraph 80 of the National Planning Policy Framework. To address this point, we suggest W2 be amended as follows:-

~~W2 To facilitate the sensitive release of Green Belt land to meet Warrington's long term housing and employment needs, whilst ensuring the revised Ensure the Green Belt boundaries maintain the permanence of Warrington's Green Belt in the long term and continue to meet the five purposes of Green Belt land as set out in paragraph 80 of the National Planning Policy Framework.~~

Objective W4 treats Warrington in isolation. As the Duty to Cooperate discussions will no doubt have already identified, there will be a growth in traffic from surrounding local authorities. For example Halton's housing proposals that will have a major impact on traffic around the A56 and on the River Mersey crossings. It is important that cross-boundary impacts are

reflected in the Plan's objectives. We therefore suggest the following additions to objective W4:

W4 To provide new infrastructure to support Warrington's growth, current and planned growth in adjoining authorities, reduce congestion and promote sustainable transport options, whilst reducing the need to travel and encouraging active lifestyles.

Objective W5 only recognises the urban area and surrounding countryside. The middle tier of District Centres and villages are omitted. We therefore suggest additions overleaf to include reference to this level in the settlement hierarchy.

Objective W5 only considers the built and natural assets in Warrington Borough Council's area. In reality, Warrington's residents also enjoy the countryside, canal, historic villages & pubs beyond the borough's boundaries. The Borough Council therefore have a vested interest in protecting the attractiveness of neighbouring historic places and beauty spots. This also helps the Borough Council demonstrate that its Local Plan has had regard to its inter-relationships with neighbouring areas. It is far preferable to value all built and natural assets enjoyed by Warrington's residents.

To address these points, we suggest that objective W5 be amended as follows:

W5 To secure high quality design which reinforces the character and local distinctiveness of Warrington's urban area, its District Centres and villages, its surrounding countryside, its unique pattern of green spaces and its constituent settlements whilst protecting, enhancing and embracing ~~the borough's~~ built and natural assets enjoyed by borough residents.

Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

Assessment of options

The Council's summary of their overall conclusions from assessing their three high level spatial options considers that settlement extensions (option 3) could have detrimental impacts on the Green Belt and the character of settlements, however the Council then ignore the impact of their Preferred Option on Walton and Stockton Heath. This inconsistency is unjustified.

We strongly disagree that the Council's preferred Option 2 "*promotes local housing choice*" as claimed in table 7 (p21) of the Preferred Development Option document. The combination of high level spatial option 2 and main development locations option 2 results in a choice of South

Warrington or South-West Warrington. This combination reduces the choice of locations for new housing in Warrington to an unacceptable degree.

Reducing commuting

The assessment of both alternative spatial options and main development locations is too broad-brush and pays insufficient attention to some of the key sustainability issues that were identified through the SA scoping exercise.

An identified key sustainability issue is the high level of commuting into and out of the Borough (page 5 of the Sustainability Appraisal Interim Report). The Economic Development Needs Study provides detailed evidence from the 2011 census on net daily commuting flows, the largest of which are commuting into Warrington from Wigan with 4,539 movements per day and commuting into Warrington from St. Helens with 4,288 net movements per day. Within Warrington, there is a daily flow of commuters from south of the river to employment opportunities north of the river.

The evidence therefore strongly suggests a market need for residential development to the north of Warrington, which would contribute to greater sustainability by reducing commuting flows arising both outside and within the borough.

The options should be assessed against the need to reduce commuting. Additional options should be explored that actively seek to reduce commuting journeys.

Missing options

To be 'justified', a Local Plan should consider all reasonable alternative options. The Plan has so far failed to do this.

Warrington Borough Council's bold vision of a New City should embrace the varied areas around Warrington, drawing them in to play an important role in contributing to a vibrant city comprised of varied neighbourhoods. The outlying settlements and particularly those to the north of Warrington could play a key role in the success of a vibrant New City with new housing close to existing employment areas.

Walton Parish Council consider that 2 additional high level options should be assessed namely:

Additional option A: 'new City extensions' - Majority of Green Belt release adjacent to main urban area and all outlying settlements with a view to joining the main urban area to the outlying settlements.

Additional option B: 'new Garden Villages' – Green Belt release adjacent to main urban area and adjacent to outlying settlements to create a constellation of 'new garden villages' circling Warrington.

Walton Parish Council consider that the impact on the Green Belt would be similar to the impact under Options 1 and 2 but would benefit existing communities by improving their links with the City.

Infrastructure delivery

The Council's draft Planning Obligations Supplementary Planning Document (SPD) published July 2016 states, "*The Council has commenced the work to introduce a Community Infrastructure Levy (CIL), but this has been delayed to enable the introduction of CIL to be undertaken in parallel with the review of the Local Plan.*" (SPD paragraph 1.3) It is therefore reasonable to assume that the CIL will be integrated with the Local Plan and that infrastructure to accompany development will be largely funded through this mechanism.

The Government's current review of CIL should result in improvements to the way CIL operates. This is likely to make its introduction more attractive to Warrington Borough Council.

The Community Infrastructure Levy enables Warrington Borough Council to obtain contributions towards infrastructure from all development in its area, irrespective of its geographic proximity to the infrastructure being delivered. This renders it unnecessary to concentrate development geographically in order to fund key infrastructure projects.

The Preferred Development Option is silent on this key point. It is important to openly acknowledge that the CIL mechanism means that distributed development around the borough would provide the new roads and river crossings sought by Warrington Borough Council.

The funding of infrastructure is a key consideration in evaluating the alternative options and this should be reflected in the Council's Sustainability Appraisal and in its final decision on what is the most appropriate strategy when considered against the reasonable alternatives, based on the evidence (NPPF paragraph 182).

The Sustainability Appraisal inadequately considers the contribution that different options are capable of contributing to infrastructure delivery, ignoring the findings of the Warrington Viability Review (July 2017), despite the fact that infrastructure delivery is a crucial part of the objectives of the Plan.

The Warrington Viability Review (July 2017) assesses incremental growth in outlying settlements as being capable of providing a surplus of £31,512 per dwelling towards infrastructure, while an urban extension of around 1,400 dwellings could provide an estimated £23,665 towards infrastructure. On these figures, incremental growth spread across the borough is preferable.

The Preferred Development Option with its proposed SW urban extension will not deliver as high a level of infrastructure as other alternatives in light of the evidence of the Viability Review and additionally for the site specific reasons set out in our response to question 12.

The Council's assessment of alternative options should be revisited to ensure that infrastructure delivery and impact on commuting & congestion are properly considered.

Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

Walton Parish Council does not believe the best option has been chosen. The Plan has not assessed all reasonable alternatives, and fails to consider provision of housing on the north side of Warrington where it has better access to existing employment opportunities, reducing the need to travel and limiting congestion.

Environmental impact

The impact of the five options on the environment has been underplayed, particularly impact on congestion, air pollution and impact on the River Mersey corridor. Reference should be made to the recent environmental evidence collected in relation to the New Mersey Gateway Bridge which can inform the Council's proposals for major change to the west and south-west of Warrington.

Option 5 (dispersed development) has major environmental benefits in terms of maintaining the strategic role and permanence of the Green Belt. It also has significant environmental benefits, including reducing in-commuting pressure and minimising congestion with associated positive impacts on air quality. Option 5 has also been incorrectly assessed in relation to its ability to deliver infrastructure.

Assessment of infrastructure delivery

The Council's assessment on the potential for the options to deliver the strategic infrastructure that Warrington badly needs fails to recognise that the Community Infrastructure Levy (CIL) breaks the direct geographical relationship between development and infrastructure. Using CIL, all options can potentially deliver infrastructure that is geographically separate from the development. The assessment's apparent bias towards large developments fails to take this into account.

The Sustainability Appraisal

The Sustainability Appraisal (SA) Interim Report does not explore the impact on the character of Warrington if it loses the gap between Warrington and Runcorn; this is a significant omission that undermines the validity of the SA. The merging of neighbouring towns is a major impact that requires proper assessment.

The SA also notably fails to assess the ability of different options to fund infrastructure, as reflected in the Warrington Viability Review (July 2017) and in our response to question 5.

The SA notes that options for urban extensions to the north of Warrington were rejected due to their potential to cause settlements to merge, with paragraph 4.3.4 stating, “*The sites in the north raised environmental concerns given their proximity to the M62 and would effectively result in the urban area merging with Winwick, impacting on the character of the settlement.*” However the South West Warrington proposals are equally likely to impact on the character of Walton village as they are on Winwick village. This is a major inconsistency in the SA that will cause issues at the Local Plan examination if not addressed in the interim.

Additional options for development locations

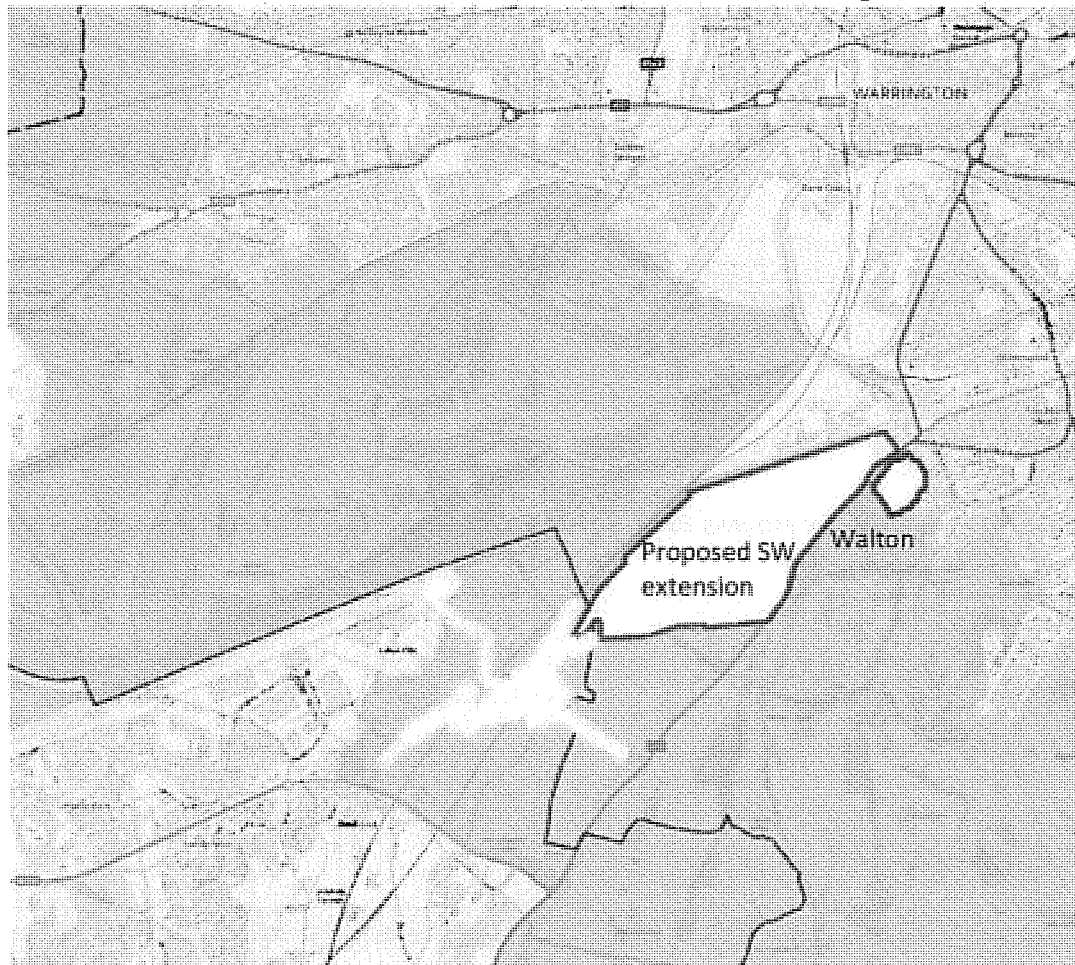
The main development locations should include an option which balances the Garden City Suburb with distributed development that links the outlying settlements with the City. This would be a very positive approach to delivering the City concept over time.

Assessment of the SW urban extension

The proposed south west extension of 2,000 houses is unacceptable for the following reasons:

- (i.) It joins Warrington to Halton, creating an almost continuous built-up area as shown in figure 1 below. This is contrary to Government policy in which the purposes of the Green Belt include, “*to prevent neighbouring towns merging into one another*”. The Preferred Development Option is totally contrary to this intention behind the Green Belt.
- (ii.) The present road structure cannot cope with the existing traffic therefore an addition of around 3,000 cars is not prudent. Furthermore, Halton Borough plan is likely to develop housing proposals around Moore, Daresbury, Preston Brook and Sandymoor making the traffic issue even more concerning.
- (iii.) This proposal will **triple** the size of Walton which will change the character of the area – this is also true for Stockton Heath as the ‘district centre’. It is inconsistent of the Council to consider this to be acceptable when the **doubling** of the size of Lymm and Culcheth and also the impact on Winwick was not acceptable. There needs to be consistency in how these options are appraised.
- (iv.) The sustainability appraisal of the South West urban extension is inadequate in relation to heritage impact, landscape impact and traffic impact, for the reasons set out in our response to question 12.

Figure 1: The Green Belt between Runcorn and Warrington



Question 7

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

For the above reasons set out in the response to Question 6, Walton Parish Council is **totally opposed** to this proposal.

Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

No comments at this stage.

Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

No comments at this stage.

Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

It is imperative that the traffic associated with this development moves northwards and does not exacerbate the traffic problems south of the Ship Canal.

There should be less warehousing, which is land hungry and inappropriate in this location which suffers from congestion and is very close to the town centre. There should be more efficient use of land in this location, with a higher density of jobs and houses.

We consider that more land should be released for housing rather than commercial development.

Question 11

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

Walton Parish Council has major concerns around the impact of the Garden City Suburb proposals on local traffic movements. The evidence published to date on transport impacts is totally inadequate. A full transport assessment should be undertaken as a priority.

As set out in our response to questions 5 and 6, development should be more evenly distributed around Warrington City, spreading both the impacts and the benefits more widely.

Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

Walton Parish Council strongly object to the proposed urban extension for five key reasons, namely:

1. Warrington will lose its separate identity from Runcorn, disregarding national policy on the purpose of Green Belts;
2. The proposals ignore legislation that protects the setting of heritage assets, including Walton Village Conservation Area and the many listed buildings in the area;
3. Impacts on the chemical works;
4. The urban extension will have an unacceptable impact on landscape character;
5. Environmental considerations on this particular site will reduce the developer contributions that can be achieved and in consequence reduce the deliverability of new infrastructure;
6. The SW urban extension has poor sustainability credentials;
7. There will be an unacceptable highways impact.

These are considered in turn below.

1. The Green Belt Assessment

The evidence base is inconsistent and inaccurate in a number of respects, making it highly vulnerable to serious challenge at the Local Plan examination stage.

The fundamental inconsistencies between the Green Belt Assessment undertaken by Arup (October 2016) and Warrington Borough Council's Additional Sites Assessment (July 2017) are summarised out in figure 2a below. The site was assessed by Arup as site WR65 and by the Council's Additional Site Assessment as site R18/125.

Figure 2a: Arup and Additional Site Assessments comparison overview

	Purpose 1: check sprawl	Purpose 2: prevent neighbouring towns merging	Purpose 3: safeguard countryside from encroachment	Purpose 4: setting of historic towns	Purpose 5: assist urban regeneration	Overall contribution
Arup WR65	moderate	moderate	strong	moderate	strong	moderate
R18/125	weak	moderate	strong	none	strong	moderate

The two sites are slightly different in extent, as shown in figures 3 & 4 overleaf. However the differences in parcel size are insufficient to justify the change in assessment against purposes 1 and 4. In particular, the Council's downgrading of *purpose 1: sprawl* from 'moderate' to 'weak' and the downgrading of *purpose 4: setting of historic towns* from 'moderate' to 'no contribution' is entirely unjustified, as is apparent when the rationale given by Arup and by the Council for their respective conclusions, reproduced in table 2b overleaf.

In relation to Purpose 1, the Council's assessment reiterates much of the Arup assessment but comes to a different conclusion. This suggests a degree of 'massaging' of the outcome to retrofit evidence in support of the Council's decision to promote this site as an urban extension.

In relation of Purpose 4: setting of historic towns, the Council's assessment of site R18/125 fails to acknowledge the existence of Walton Village Conservation Area. This is completely unjustified, particularly as site R18/125 includes land to the immediate west of the conservation area, the extent of which is shown in figure 5 below. This omission fundamentally undermines the validity of the assessment.

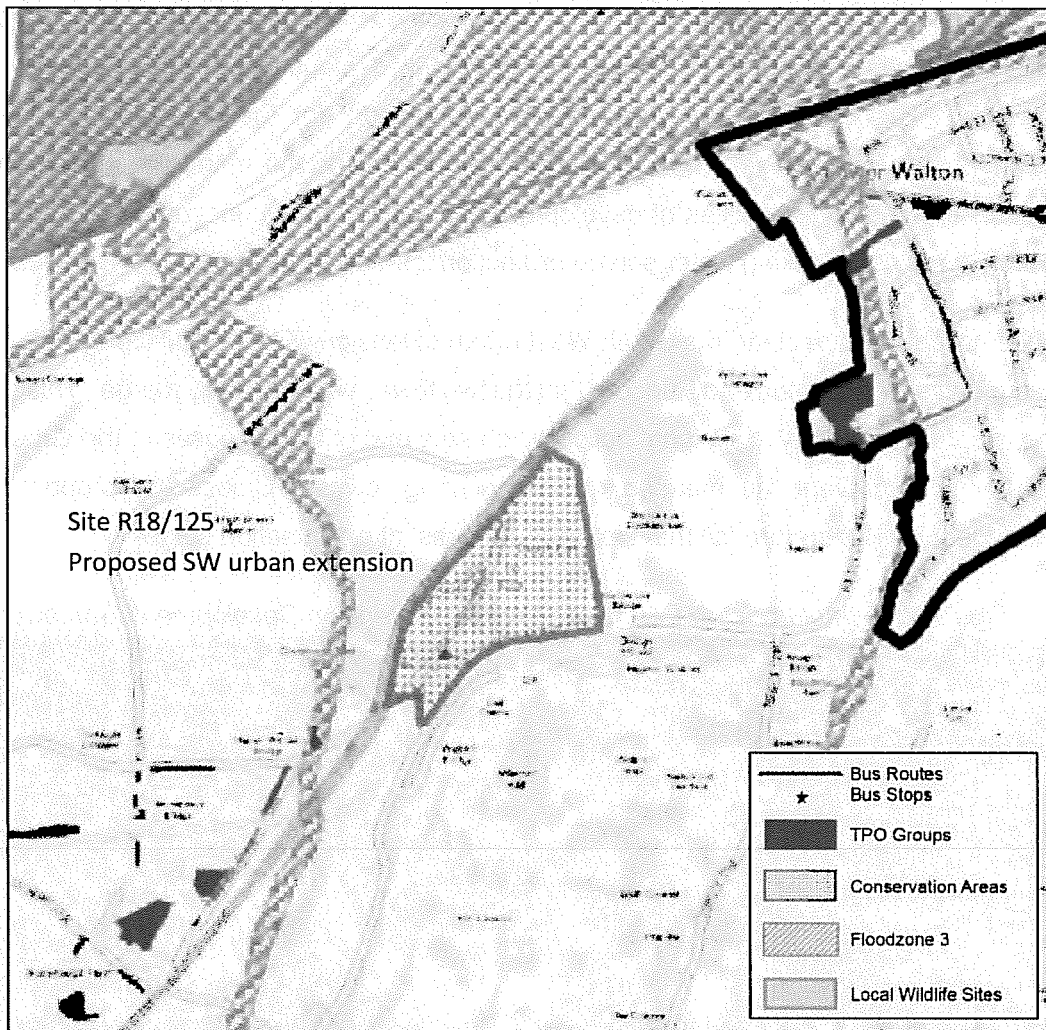
Figure 2b: Comparison of Arup and Council's assessments

Assessment	Purpose 1: check sprawl	Purpose 4: setting of historic towns
Arup WR65	Moderate contribution. The parcel is poorly connected to the settlement on two sides. The Manchester Ship Canal forms a durable boundary. The eastern boundary consists of a hedge and tree lined garden boundary which is not durable and may not be able to prevent sprawl into the parcel from the east. Overall the parcel makes a moderate contribution to checking unrestricted sprawl.	Moderate contribution. Warrington is a historic town. The parcel falls within the 250m buffer area around the Walton Village Conservation Area. The Conservation Area is located within the Green Belt. The parcel is separated from the Conservation Area by the A56 (Chester New Road) and open fields. Therefore the parcel makes a moderate contribution to preserving the setting and special character of historic towns.
Council R18/125	Weak contribution. The Manchester Ship Canal forms the northern boundary between the site and the built-up area which is a durable boundary that is able to prevent sprawl into the site in the long term. The short eastern boundary with the built up area is formed by hedges and a tree lined garden boundary which is not durable and may not prevent sprawl in the long term. Given the shape of the built-up area, development of the site would not round off the settlement pattern. Overall the site makes a weak contribution to checking unrestricted sprawl	No contribution: Warrington is a historic town however the site is not within 250m of the Warrington Town Centre Conservation Areas. The site does not cross an important viewpoint of the Parish Church.

The Council's Additional Sites Assessment conclusion that the site, "makes a weak contribution to preventing towns from merging" is clearly inaccurate. If site R18/125 were developed as proposed by Warrington Borough Council, there would be an almost continuous line of urban development between Runcorn and Warrington, as shown in figure 1 on page 9.

In order for the Local Plan to be found 'sound', it is essential that the evidence base is reconsidered, corrections made and the implications for the Local Plan's overall strategy are addressed.

Figure 5: Extent of Walton conservation area (Source: South Warrington Settlement Profile)



The representations by Peel Holdings Ltd (R18/125) suggest they would include a buffer of between Warrington's urban edge and Walton village. Not only is this totally inadequate as a 'green gap' between settlements, it is also highly dubious that it would be delivered in practice. The Council's own Development Framework for the site shows residential development to the edge of the village of Walton. This is the more likely scenario and reflects the economic realities of development on a site that is constrained on its eastern half by flood risk, drinking water source protection zones and HSE exclusion zones.

The implications are clear; the South West urban extension will so significantly reduce the gap between Warrington and Runcorn that the two towns will effectively merge. This makes the proposals contrary to national policy which sets one of the purposes of the Green Belt as being to prevent the merging of neighbouring towns. Unless the proposals are amended, it will therefore fail the 'test of soundness' at examination stage.

Figure 2: Extract from the Council's SW urban extension Development Framework



2. Impact on heritage assets

Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework. (PPG Paragraph: 002 Reference ID: 18a-002)

Among the Core Planning Principles set out in paragraph 17 of the NPPF are that planning should: “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*” (NPPF paragraph 17)

Section 12 of the National Planning Policy Framework requires:

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.” (para 129)

Unless the Local Plan satisfactorily addresses these issues, it risks being contrary to the provisions in the Planning (Listed Buildings and Conservation Areas) Act 1990 and risks being found ‘unsound’ at the Local Plan examination.

Figure 6: Extract from SW Warrington Development Concept



Figure 2.11: Historic Assets Map

The National Planning Policy Framework requires Local Plans to be accompanied by suitable evidence on heritage issues:

“Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record.” (NPPF paragraph 169)

“Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.” (NPPF paragraph 170)

To meet these requirements of the NPPF, as a minimum the proposals for the South West Warrington urban extension should be accompanied by:

- a Heritage Impact Assessment on the Walton Conservation Area and the multiple listed buildings & structures in the area, including impact on their settings; and
- an assessment of Historic Landscape Character.

3 Impact on the Chemical Works

England does not have many chemical works of the sophistication and size of the plant at Warrington. It is important that residential development is not at the expense of our national chemical industry. There are many potentially suitable locations for residential development, but far fewer for investment in our chemical manufacturing ability.

The proposed SW urban extension involves large numbers of new homes within a COMAH protection zone. This is in itself unwise and contrary to the National Planning Policy Framework.

If the SW urban extension goes ahead, the presence of large numbers of homes in the vicinity of the Chemical Works will conflict with any attempts to expand or intensify the use of the works. It will prevent the adoption of any new chemical processes that would extend the COMAH zones. Overall it is likely to result in less investment at the Chemical Works and limitations on the ability of the works to adapt in the future to changing chemical processes and market opportunities.

The National Planning Policy Framework reflects the important principle that existing industries should be protected from new residential development that would restrict them in future. Paragraph 123 of the Framework states that:

“Planning policies and decisions should aim to:

- ***Recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established”***

Paragraph 120 of the Framework states that:

“To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location.”

The Chemical Industry is a key industrial resource for England’s future. However the allocation of land for 1,800 homes close to the Chemical Works has an unacceptably harmful potential impact on both new residents and on the future of the chemical industry. Accordingly, the SW urban extension should be dropped from the Council’s development strategy.

4. Landscape Impact

The National Planning Policy Framework requires,

“Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity” (NPPF paragraph 170).

To meet the NPPF requirements there should be a suitable assessment available for the Warrington South West Urban Extension (WSWUE) proposals¹.

The Council’s *WSWUE Framework Plan Document* (June 2017) very briefly covers the topic of landscape sensitivity, with one page of text, one map and one page of photographs. This is insufficient and does not meet the requirements of a proper Landscape and Visual Impact Assessment (LVIA).

The best available evidence is the Council’s Landscape Character Assessment (2007)² which is broad-brush and a decade out-of-date. The site falls within broad Area 3.A Appleton Park and Grappenhall areas of the Red Sandstone Escarpment. Relevant sections of the Landscape Character Assessment are reproduced in figure 9 below. The Council’s own assessment shows that this landscape is, *“particularly sensitive to further building*

¹ https://www.warrington.gov.uk/info/201368/local_plan_review/2347/local_plan_review_-_supporting_documents

² https://www.warrington.gov.uk/info/200564/planning_policy/1905/evidence_base/5

development" and that development, "will cover some of the most attractive landscape in the Borough."

In conclusion, a full LVIA that follows the accepted Guidelines for Landscape and Visual Impact Assessment (GLVIA3)³ should be provided for this site.

Figure 9: Relevant extracts from the Council's Landscape Character Assessment (2007)

Landscape Sensitivity

In a borough-wide context, both these areas are reasonably well-wooded with a diversity of features in the landscape, including small ponds, ridges, knolls and incised stream valleys. The agricultural landscape including hedgerows appears generally well-maintained and the area presents an attractive rural quality. Both these areas however are particularly sensitive to further building development.

...

The crest line of the escarpment is particularly important as this forms the main horizon to views south from the northern half of the Borough. The traditional isolated focal points of church towers along the crest are slowly being occluded by development. A prime example of this is the Daresbury Business Park, just outside the Borough. Most of these buildings stand out on the crest line and are particularly noticeable by their roofs, which reflect the sunlight. If development occurs all along the crest line, the currently attractive rural horizon views will be lost and the importance of traditional focal points will be subsumed.

Key elements of landscape sensitivity:

- Building development on the crest/skyline
- Loss of agricultural landscape for housing development

Recommended Management and Landscape Objectives

The main objective for these areas should be to aspire to retain their present status as a well-managed agricultural landscape. The currently proposed large areas of housing development however works against this objective and will cover some of the most attractive landscape in the Borough. Development in particular on the escarpment crest lines and knolls should be prevented or screened by woodland planting. The remaining landscape will require a continuance of good agricultural management practices, together with the encouragement of enhancement works such as replacement of hedgerow trees and the restoration of marl pit ponds.

³ <https://www.landscapeinstitute.org/technical/glvia3-panel/>

4 Environmental costs

The south western urban extension has a number of environmental problems which can be mitigated, but at a cost. This reduces the amount of development value, impacting on the viability of development and the ability of the scheme to provide developer contributions towards infrastructure. The cost of mitigating the environment problems poses a significant risk to the delivery of the new infrastructure that the Council aspires to achieve.

The south-west urban extension is in the catchment of the public water supply. Consequently development will be required to use mitigation measures to protect groundwater (figure 10). It also has flooding issues from both fluvial and ground water flooding (figure 5).

Other constraints that reduce the gross development value of the site are the safety exclusion zone around the chemical works on the opposite side of the Ship Canal (figure 11 overleaf).

These costs of development reduce the funds available for developer contributions towards infrastructure and may undermine the Council's aspirations to deliver new roads and bridges across the River Mersey and Ship Canal. It is therefore essential that the Council consider carefully the viability of development on this site *relative to other sites* before deciding whether it will deliver the Council's aspirations for new infrastructure.

Figure 10: Groundwater protection zones

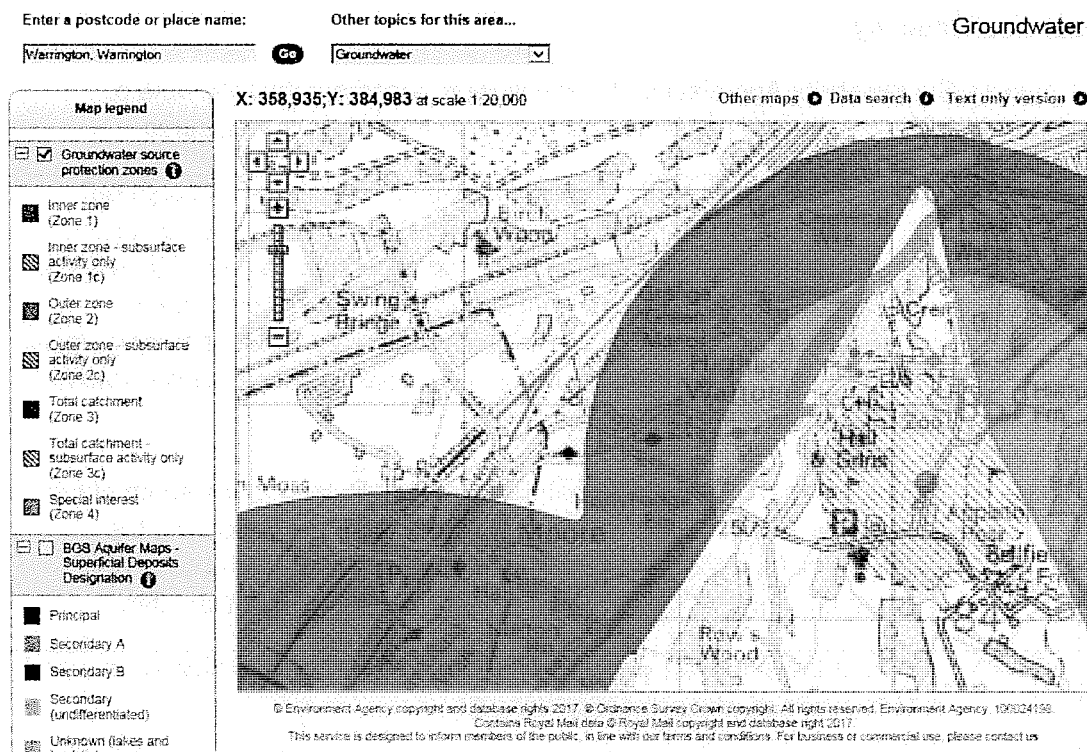


Figure 11: Extract from SW urban extension Development Framework



Figure 2.13: Utilities Constraints Map

5 Poor sustainability

The Council's Sustainability Appraisal of the site is reproduced overleaf for ease of reference. We note that the site performs poorly against the following measures:

NR3	<p>67% of the site is grade 2 agricultural land. Development could be contrary to paragraph 112 of the NPPF which states: "<i>Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.</i>"</p> <p>We note that this site requires the loss of extra land to the south of the Chemical Works that is required as a safety buffer, increasing the amount of land removed from agricultural use over and above what would be required for the same number of houses on other sites.</p>
NR4	<p>83% of the site overlaps with groundwater source protection zone 3 and 15% overlaps with protection zone 2.</p>

BNH3	The Landscape Character Assessment records that: <i>"This area is however particularly sensitive to further building development. The site would lead to large scale development on open greenspace."</i> See our comments on landscape on pages 18-19 of this response.
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The current SA is inaccurate in a number of respects:

ACC5	Stockton Heath Medical Centre and Stretton Medical Centre are full and therefore not available to new residents. The distance to GPs and health centres that have capacity is much greater in consequence. This site should be scored 'red' on the ACC5 measure.
BNH1	The SA notes the 3 listed structures, but does not mention the many non-designated heritage assets also on the site. This site should be scored 'red' on the BNH1 measure.
BNH2	The assessment ignores the impact on the setting of the Walton conservation area. The SA inaccurately refers to the A55 when in fact the relevant road is the A56. The historic environment includes an historic landscape (as referred to in the Council's Landscape Character Assessment) and historic hedges. Local hedgerows contain species that are only found in very ancient hedges; the hops growing on Hollyhedge Lane are an example illustrated in the photographs below. This site should be scored 'red' on the BNH2 measure.

Photographs of local ancient hedgerows containing hops



In conclusion, sites that score higher against the Council's sustainability criteria are available and should be developed in preference to this site.

NB. Despite the site name of Latchford, this site is the South West Urban Extension. See BHN1 which refers to the site being adjacent to Walton Village Conservation Area. We consider the scores against criteria ACC5, BNH1 and BNH2 to be incorrect.

Warrington ID:	Reg18/125	AECOM ID:	141
Site Name:	Land at Higher Lane, Latchford		
Location:	Central Warrington		
Area (Ha):	124.91		
Potential Use:	Housing		

Key to site appraisal scores:

Significant positive effects possible	Positive effects possible	Negative effects possible	Significant negative effects possible
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SA Objective and appraisal score	
EC1: Would site development lead to the loss of employment land?	
<i>Rationale: Site is not employment land.</i>	
EC2: Distance to Principal Road Network by vehicle.	
<i>Rationale: 10m from road network</i>	
EC3: How close is the site to key employment sites?	
<i>Rationale: 756m from Acton grange Moore</i>	
HW1: Is the area supported by community facilities? (Village halls, places of worship, community centres)	
<i>Rationale: 3 community facilities / buildings within 800m of site. NB. Site could potentially support additional facilities.</i>	
HW2: Access to local natural greenspace (ANGST). To what extent do the sites meet the following ANGST ¹ standards?	
<i>Rationale: Standards met for 1 of the criteria (there is 1 natural greenspace site within 300m of the site that is over 2Ha in size). N.B. Size of site could present opportunity for new local greenspace to be established</i>	
HW3: Access to formal play space	
<i>Rationale: 607m to the nearest play area (Walton Gardens)</i>	
ACC1: How accessible is the site to the nearest primary school on foot?	
<i>Rationale: 1.05km from Stockton Heath Primary School NB. Site could potentially support new facilities as it is over 30 Ha.</i>	
ACC2: How accessible is the site to the nearest Secondary school?	
<i>Rationale: 2.65km from Bridgewater High School</i>	
ACC3: How well served is the site by a bus service?	
<i>Rationale: 263m from bus stop. Low frequency service</i>	
ACC4: How accessible is the site to the nearest train station?	
<i>Rationale: 2.86km from Warrington Bank Quay Station</i>	
ACC5: What is the overall distance to a GP service or health centre?	
<i>Rationale: 1.22km of Stockton Heath Medical Centre</i>	
HO1: To what extent will the development help to meet housing needs?	/
<i>Rationale: Due to incomplete data, sites have not been assessed against this criterion.</i>	

NR1: What are the potential impacts on air quality?

Rationale: Development is 227m away from an AQMA

NR2: Could development of the site lead to the remediation of land affected by contamination?

Rationale: Approximately 4% of the proposed site overlaps with land that is potentially contaminated which could be remediated.

NR3: Would allocation of the site result in the loss of High Quality Agricultural Land?

Rationale: 67% of the proposed site overlaps with grade 2 agricultural land (approximately 83 Ha) and 22% overlaps with grade 3 agricultural land (approximately 27 Ha).

NR4: Does the site fall within a Groundwater Source Protection Zone?

Rationale: 83% of the site overlaps with groundwater source protection zone 3 and 15% of the site overlaps with groundwater source protection zone 2.

NR5: Is the site (or part of) within an identified flood zone?

Rationale: 6.07% of the proposed site comprised land within flood zone 2 and 5.16% of the site comprises land within flood zone 3. However, the site predominantly falls within flood zone 1.

RU3: Is there potential for safeguarded or identified mineral reserves to be sterilised?

Rationale: Parts of the northern half of the site are located within the sand and gravel MSA and its buffer. Include a requirement within any future allocation policy for development proposals to consider prior extraction of any sand and gravel resource beneath the site and the issue of proximal sterilisation of resources within the MSA on adjacent land.

BNH1: Proximity to designated heritage assets

Rationale: There are 3 listed heritage assets within the site boundary. Adjacent to Walton Village Conservation Area.

BNH2: Effects upon the significance and setting of heritage assets / the historic environment.

Rationale: Though the site is adjacent to a conservation area, it is physically separated by the A55, and the sites development would not affect its character. There are three heritage assets (bridges) at the boundary of the site to the south. Whilst large scale development has the potential to alter the character of the open countryside, it ought to be possible to secure mitigation. Views along the canal could be affected by development, so it would be beneficial to seek green infrastructure protection/enhancement alongside the river corridor.

BNH3: Capacity of the landscape to accommodate development, while respecting its character.

Rationale: The site falls within the Red Sandstone Escarpment local character area (3a Appleton and Grappenhall). The character area covers a rather large amount of land, and so it has different features and sensitivities. Broadly, this area is reasonably well-wooded with a diversity of features in the landscape, including small ponds, ridges, knolls and incised stream valleys. The agricultural landscape including hedgerows appears generally well-maintained and the area presents an attractive rural quality. This area is however particularly sensitive to further building development. The site would lead to large scale development on open greenspace.

BG1: Could allocation of the site have a potential impact on a European Site, SPA or SAC?

Rationale: Unlikely, the site is over 7km from the nearest SPA (Mersey Estuary)

BG2: Could allocation of the site have a potential impact on a SSSI

Rationale: Unlikely, site is over 3km from nearest site (Red Brow Cutting)

BG3: Could allocation of the site have a potential adverse impact on designated Local Wildlife Sites

Rationale: The proposed site is 56m from the nearest asset (BAP Woodland and Orchard Habitat)

BG4: What is the potential impact on TPOs?

Rationale: 0.26% of the proposed site overlaps with a TPO, however these could be potentially protected as they are generally confined to the boundary of the site.

RU1: Would allocation of the site result in the use of previously developed land?

Rationale: Site is predominantly greenfield

6 Highways Impact

The present road structure cannot cope with the existing traffic therefore an addition of around 3,000 cars is not prudent. Furthermore Halton Borough plan is likely to develop housing proposals around Moore, Daresbury, Preston Brook and Sandymoor making the traffic issue even more concerning. Local highways impacts have not been adequately addressed with inadequate evidence gathered by the Council on this key issue.

The proposed residential development site D1 in the Council's WSWUE Framework Plan has a proposed access that is too close to the Western Link lighted junction. The additional 250-300 cars associated with site D1 and traffic queuing to turn into this site will create further traffic congestion and delays on the A56. There should be **no** development on the south side of the A56, to avoid a new junction at an already overloaded area of the road.

There is insufficient consideration of the relative performance of the different options in relation to highways impact in the Council's sustainability appraisal.

Conclusions

The Borough Council must be fair and even-handed in their appraisal of the relative impact of their proposals on existing villages. This proposal will **triple** the size of Walton which will change the character of the area – this is also true for Stockton Heath as the 'district centre'. The Council has not explained why it considers this acceptable when it found it was **not** acceptable to **double** the size of Lymm and Culcheth and to enlarge Winwick village. There needs to be consistency in the Council's appraisal of alternative options, with fairness in the Council's treatment of villages.

Walton Parish Council strongly object to the proposed South West urban extension which in summary:

- Effectively joins the towns of Warrington and Runcorn contrary to national policy on the purpose of the Green Belt. Once lost, this gap is gone forever and will have a permanent, detrimental impact on the character of both towns.
- The Green Belt Assessment that has been done is inconsistent and has important omissions that render it unsound.
- The SW urban extension proposals are inconsistent with national policy and legislation in relation to the protection of heritage assets.
- There is an adverse impact on the future of the Chemical Works as well as unacceptable risk of harm to future residents, as the COMAH zones may widen as new chemical processes are developed.
- The existing Sustainability Appraisal is lacking in key areas, including insufficient consideration of landscape impact.

- Flood risk, the HSE exclusion zone and drinking water protection zone mean this site has high development costs which reduce its ability to contribute to new infrastructure.
- Traffic impacts are unacceptable and have been inadequately considered by the Council.
- Other options produce better results against the Council's strategic objectives.

These issues will lead to problems at the Local Plan examination and could result in the potential for legal challenge.

We trust that Warrington Borough Council will address these concerns. The Parish Council are willing to engage with the local planning authority and would welcome further discussions as the Final Plan is prepared, in order to reduce areas of disagreement before the Local Plan examination stage.

Question 13

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

Walton Parish Council believes there should be much more than incremental growth in the Outlying Settlements. These should be geared to closing the gap between them and the main urban area to ensure that all parts of the borough are integrated in the Council's vision for a vibrant New City.

The majority of jobs are located on the north side of the river and therefore it would be sensible to drop the Council's proposals for a south-west urban extension and instead direct more housing development to the outlying settlements to the north of Warrington.

Question 14

Do you agree with our approach to providing new employment land?

No comments at this stage.

Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

Walton Parish Council **strongly objects** to the proposal to allocate 20 pitches at Two Acre Caravan Park because it is:

- Contrary to national policy on the **Green Belt**;
- Inappropriate design **adjacent to the Walton Village Conservation Area**;
- **Rewards unauthorised activity** on the site, sending a message that it pays to 'flout the law of the land'. This sets a dangerous precedent and shows weak management of the issue.

We are deeply disappointed that planning consent was granted on 21st September 2017 for 20 pitches (up to 30 caravans) in advance of the Local Plan process. This undermines the credibility of the Local Plan and the validity of the consultation process.

Moving forward, there should be no change in the status of the Green Belt on this site, which currently 'washes over' the Walton Village Conservation Area and surrounding land. The Local Plan should make it clear that no additional pitches will be permitted on this site.

To prevent further unauthorised encampments, it is essential that the Local Plan identify sites in suitable locations. We accept that due provision needs to be made but it should **not** be at the cost of making illegal actions pay for the perpetrator. Other sites should be found within the borough boundaries and Warrington Borough Council should show strong leadership in this regard.

Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

No comments at this stage but we reserve our right to comment at Final plan stage.

Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

Heritage Assets

The Plan must protect heritage assets, as required to do by legislation and the National Planning Policy Framework. This has been inadequately considered to date, and has a significant impact on the Preferred Option.

Identifying Warrington's Green Lungs

The borough's residents need not only jobs and homes, but also leisure opportunities that enrich the quality of life. The Plan should therefore identify treasured areas that act as 'green lungs' for Warrington. These benefit all residents and are an important aspect of achieving the Council's aspirations for a vibrant future.

Walton Hall & gardens, Walton Golf Course, the canal, country walks and historic places need to be recognised and protected in the emerging Local Plan.