

Warrington Local Plan EiP

Matter 2: The Duty to Co-operate

On behalf of Taylor Wimpey, Bloor Homes, Lone Star Land and Mulbury (Grappenhall) Limited.

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1. Matter 2 – Duty to Co-operate

Housing needs, the housing requirement and overall housing provision

- 1.1. We raised various issues in relation to Duty-to-Cooperate issues in paragraphs 4.22 to 4.26 of our Regulation 19 representations, which principally referred to the Draft Statement of Common Ground issued in Sept 2021.
- 1.2. We note that a final SOCG documents have now been issued (SP10 and SP11) and addresses a number of the issues we previously raised. However, we note there are still some outstanding issues that require consideration in relation to the South East Urban Extension and South East Employment Area and Fiddlers Ferry proposed allocations.

Q1. Who has the Council engaged with in terms of housing needs, the housing requirement and housing provision and what form has this taken?

- 1.3. We note the Duty to Cooperate Statement Update (September 2021) and Duty to Cooperate Statement Addendum (April 2022) sets out who the Council have engaged with in terms of housing needs, the housing requirement and housing provision. This includes, but is not limited to, those Boroughs within the Mid-Mersey Housing Market Area (HMA) including Halton Borough Council and St Helens Borough Council.

Q2. What are the inter-relationships with other authorities in terms of migration, commuting, housing markets and service provision?

- 1.4. The Mid-Mersey HMA was established based on commuting patterns from 2011 Census and the ONS 2011 Travel to Work Area. The Local Housing Need Assessment Update (August 2021) sets out that the Mid-Mersey HMA boundaries remain valid for the purpose of that assessment¹. This includes Warrington, Halton and St Helens.
- 1.5. Notwithstanding the single HMA previously referenced, we consider Warrington has its own housing market traits that are unique to Warrington when compared to Halton and St Helens and the main town or Warrington should be meeting the vast majority of housing need generated from within the Borough.
- 1.6. In this context, we point out that the Fiddlers Ferry site sits directly adjacent to the urban area of the main town of Widnes (part of Halton) and is significantly separated from the main town of Warrington. Widnes Town Centre is approximately 2km from the Fiddlers Ferry site, whereas it is over 6km from Warrington Town Centre and separated by Green Belt. We object to this site but should it come forward, it will therefore rely on services in Widnes/Halton rather than Warrington and therefore there is a strong chance that it will actually meet needs arising from Halton rather than the main urban area of Warrington.

¹ Para 3.11, Warrington Local Housing Needs Assessment Update (April 2022)

Q3. How have the issues of housing needs, the housing requirement and overall housing provision been addressed through co-operation? What are the specific outcomes for example in terms of statements of common ground?

- 1.7. We note that WBC, Halton Borough Council and St Helens Borough Council agree to meet their own objectively assessed housing need within their Boroughs².

Q4. What is the position of other authorities in terms of the approach to identifying and meeting housing needs? Have specific concerns been raised through duty to co-operate discussions or representations?

- 1.8. The Warrington Borough Council – Statement of Common Ground (April 2022) does not identify any concerns raised by Halton Borough Council and St Helens Borough Council in relation to their housing needs. Halton Borough Council made no representations to the second draft Regulation 19 WLP. Whilst St Helens Borough Council made representations to the second draft regulation 19 WLP, they did not comment on housing needs. We note this was the case even when the Council were proposing a higher level of housing growth and reflects the fact that Warrington can meet housing growth above the Submitted Local Plan requirement in a sustainable manner (as promoted through the Regulation 18 and first Regulation 19 draft local plans).

Q5. Are there any issues of unmet need to be addressed?

- 1.9. The Warrington Borough Council – Statement of Common Ground (April 2022) does not identify any issues of unmet housing need to be addressed from further afield albeit we do not recent statements from Liverpool Council that they will now need to carry out an immediate Local Plan Review.
- 1.10. We would also like to point to the fact that the Liverpool City Region Strategic Development Strategy is still to be produced and should that raise any issues with the inability to meet the City Region’s housing requirements (including the 35% uplifts afforded to Liverpool), then there will be a potential need to review the Warrington Local Plan within a short time period as it would represent the next obvious authority to address such requirements.

Economic Growth/employment land provision

Q6. What are the cross-boundary issues relating to economic growth and employment land provision?

- 1.11. Omega West (which includes allocation 1EA in the emerging St Helens Borough Local Plan) is within St Helens administrative boundary and will contribute to meeting Warrington’s employment land needs.

Q7. Who has the Council engaged with? When did this engagement take place and what form did it take?

² Para 4.6, Warrington Borough Council – Statement of Common Ground (April 2022)

- 1.12. The Duty to Cooperate Statement Update (September 2021) and Duty to Cooperate Statement Addendum (April 2022) sets out who has the Council have engaged with regards to Omega West. This includes St Helens Borough Council and National Highways.

Q8. What is the outcome of this engagement?

- 1.13. The outcome of this engagement is set out in the Warrington Borough Council – Statement of Common Ground (April 2022) and Statement of Common Ground between WBC and National Highways (March 2022).

Q9. Specifically, how has the Council co-operated with St Helens Borough Council regarding the apportionment of the employment land at the Omega extension and what is the result of that co-operation?

- 1.14. WBC has agreed with St Helens Borough Council in principle that the westward extension of Omega (identified as proposed site allocation 1EA in the now adopted St Helens Borough Local Plan), will contribute to meeting Warrington’s employment land needs, subject to resolving access issues³.
- 1.15. WBC had undertaken a programme of improvements to the local and strategic highway networks and the public transport network to facilitate the sustainable growth of Omega as a strategic employment location and has taken account of the proposed western extension of Omega in its transport modelling work⁴.
- 1.16. The emerging St Helens Borough Local Plan was examined on the basis that the westward extension of Omega (identified as proposed site allocation 1EA in the emerging St Helens Borough Local Plan) would meet Warrington’s employment land needs⁵.
- 1.17. There remains an issue between WBC and St Helens Borough Council in terms of the apportionment of additional land consented at Omega West. Comments are provided at Q12.

Q10. What is the position of other authorities in terms of the Council’s approach to these issues? What specific concerns were raised through duty to co-operate discussions or representations on the Local Plan?

- 1.18. No comments.

Strategic housing and employment sites

Q11. What cross boundary issues are there in relation to the Main Development Areas and how have these been dealt with through co-operation?

South East Warrington Urban Extension and South East Warrington Employment Area

³ Para 4.11, Warrington Borough Council – Statement of Common Ground (April 2022)

⁴ Para 4.34, Warrington Borough Council – Statement of Common Ground (April 2022)

⁵ Para 87, St Helens Borough Council, St Helens Borough Local Plan, Inspectors’ Report 18 May 2022

- 1.19. The South East Warrington Urban Extension and South East Warrington Employment Area have the potential to have implications on the M6 and M56 motorway as identified by National Highways and on the road network in Cheshire East and in Cheshire West and Chester⁶. Both Cheshire East Council⁷ and Cheshire West and Chester Council⁸ have raised concerns about this.
- 1.20. WBC are intending to deal with these issues by:
- Continuing to work with National Highways to ensure there is a full understanding of the impact of the proposed South East Warrington Urban Extension and South East Warrington Employment Area (both cumulative and individual) and to agree the detail of the required mitigation measures
 - Sharing the outputs from the modelling work and agreeing the mechanisms by which any mitigation measures within Cheshire East will be carried out and, in Cheshire West and Chester, if required
 - Providing information on the potential changes to commuting and migration flows arising as a result of the overall development proposed through the Local Plan particularly as they relate to Cheshire East and provide greater clarity on their likely consequences for the transport infrastructure and networks within Cheshire East⁹
- 1.21. It would be useful if WBC, Cheshire East Council, Chester West and Chester Council and / or National Highways could provide any necessary updates during the examination as it will be important that any further discussions and workstreams in this regard deal with the remaining issues. We reserve the right to comment on this further during the examination.

Fiddlers Ferry

- 1.22. We object to this proposed site. Given the location of the site on the border between Warrington and Halton, it raises deliverability concerns in relation to certain cross boundary impacts, including impacts on Halton's transport and social infrastructure. It will also be important to ensure a robust Green Belt boundary to maintain separation between Widnes and Warrington¹⁰.
- 1.23. We note that WBC are intending to deal with these issues by:
- Continuing to work with Halton Borough Council to resolve any issues arising from the allocation;
 - Ensuring appropriate mitigation is provided to address any impacts on Halton's transportation and social infrastructure arising from the allocation;

⁶ Para 4.23, Warrington Borough Council – Statement of Common Ground (April 2022)

⁷ Para 4.26, Warrington Borough Council – Statement of Common Ground (April 2022)

⁸ Representors Log (April 2022)

⁹ Ibid

¹⁰ Para 4.4.3, Statement of Common Ground between WBC and National Highways (March 2022)

- Agreeing the mechanisms by which any mitigation measures within Halton will be carried out;
- Working with Halton, St Helens and National Highways to identify and mitigate any impacts on Junction 7 M62¹¹

1.24. It would be useful if WBC, Halton Council and / or National Highways could provide any necessary updates during the examination as it will be important that any further discussions and workstreams in this regard deal with the remaining issues. We reserve the right to comment on this further during the examination.

Q12. Are there cross boundary issues that arise from strategic allocations or planning permissions in neighbouring authorities and if so, how have these been dealt with through co-operation?

1.25. The planning consent for employment land at Omega West covers an area of 75ha¹².

1.26. WBC is concerned about any further growth in this area and considers that this would require significant infrastructure improvements to the local and strategic road network, and that WBC will continue to review any additional employment proposals through ongoing duty to cooperate discussions with St Helens and National Highways¹³.

1.27. No agreement has been reached on which Borough's need the additional land (over and above the 31.2ha allocation area) will contribute to, and we understand that WBC are intending to continue to liaise with St Helens Borough Council over the apportionment above and beyond the 31.2ha proposed to be allocated in the St Helens Borough Local Plan¹⁴.

1.28. Consideration of any additional land in this area will require a cumulative traffic assessment of the impact on J8 of the M62 and will require a consistent approach between the WLP and St Helens Borough Local Plan, agreed through ongoing duty to cooperate discussions between the two Councils and National Highways¹⁵.

1.29. At this moment in time, we are not aware that WBC and St Helens Borough Council have agreed the apportionment of the employment land at Omega West. If it is agreed that WBC would take an apportionment above and beyond the 31.2ha proposed to be allocated in the St Helens Borough Local Plan, this would require significant infrastructure improvements to the local and strategic road network. As such, we reserve the right to comment on this further during examination.

Other strategic matters

¹¹ Para 4.31, Warrington Borough Council – Statement of Common Ground (April 2022)

¹² Para 4.35, Warrington Borough Council – Statement of Common Ground (April 2022)

¹³ Para 4.5.5, Statement of Common Ground between WBC and National Highways (March 2022)

¹⁴ Para 4.35 and 4.36, Warrington Borough Council – Statement of Common Ground (April 2022)

¹⁵ Para 4.5.5, Statement of Common Ground between WBC and National Highways (March 2022)

13. Taking each of the following in turn, what cross boundary issues are there and how have they been addressed through co-operation?

a) Green Belt alteration (within Warrington and elsewhere)

1.30. The following matters are unresolved:

- Issues arising from the Fiddler Ferry allocation in relation to a robust Green Belt boundary which maintains separation between Widnes and Warrington

b) Transport infrastructure and mitigation

1.31. The following matters are unresolved:

- Issues arising from the South East Warrington Urban Extension and South East Warrington Employment Area (both cumulative and individual) in relation any impacts on Cheshire East Council's and Cheshire West and Chester Council's highways network
- Issues arising from the Fiddler Ferry allocation in relation any impacts on Halton's transportation and social infrastructure, and mechanisms by which any mitigation measures within Halton will be carried out

c) Other infrastructure needs

1.32. No comment.

d) Ecological/biodiversity issues

1.33. No comment.

e) Green infrastructure

1.34. No comment.

f) Gypsy and Traveller needs

1.35. No comment.

g) Minerals

1.36. No comment.

h) Waste

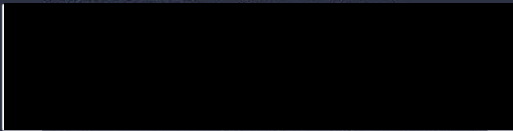
1.37. No comment.

Q14. In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

1.38. All we note is that there are still unresolved issues with some cross boundary matters, as highlighted above.

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