

Warrington Local Plan Examination

Matters Statements – Technical Note

Outstanding HRA ISSUES

September 2022



Introduction

- 1.1 This note has been prepared to address, in part, Natural England's (NE) Revised Response to the Inspectors MIQs (Document M1.12a). The note is specifically to respond to the text in bullet point 3 (highlighted in bold below) of NE's advised actions that they consider are required to address outstanding HRA issues:
- The HRA **needs to set out the steps that the Council has gone through in its consideration of the mitigation hierarchy and the process of reviewing alternatives/avoidance. The HRA should evidence the measures that have been considered and any reasons why they have been ruled out.** For mitigation measures to provide the required certainty they should be specific and have a secured delivery mechanism.
- 1.2 The note first sets out how consideration of impacts on designated ecological assets has been incorporated into the options assessment process for the Updated Proposed Submission Version Local Plan 2021.
- 1.3 It then considers the spatial strategy of the Plan in the context of the identified in-combination impact on Holcroft Moss within the Manchester Mosses Special Area of Conservation (SAC).

2. Options Assessment Process

- 2.1 The Council has assessed a range of options for both the scale and distribution of housing and employment growth. These are outlined in detail in the Council's [Development Options and Site Assessment Technical Report - Sept 2021 \(O1\)](#):
- Section 2 of the report outlines the levels of housing growth that have been considered and the high level of spatial distribution of these options;
 - Section 3 of the report outlines the process for identifying the sites that it is proposed to allocate in the Outlying settlements;
 - Section 4 of the report outlines the range of options considered for housing growth adjacent to the main urban area and explains the process for identifying the preferred option; and
 - Section 6 of the report outlines the levels of employment growth that have been considered and the assessment process for the spatial distribution of these options.
- 1.2 All of these options for both scale and distribution of housing and employment growth have been assessed through the Council's SA/SEA process as set out in the [Sustainability Appraisal Report \(SP3\)](#).
- 1.3 The SA/SEA considered the impacts of the options for growth and distribution of development on air quality and biodiversity under the SA Objective 'Protect, maintain and enhance biodiversity and geodiversity' (see Site Appraisal Framework - Appendix A of the SA Report). Under this objective there is a specific criteria BG1

'Could allocation of the site have a potential impact on a European Site SSSI, SPA or SAC?'. As such, the Council is confident that it has considered potential impacts on designated sites through its SA/SEA options assessment process.

- 1.4 How the Sustainability Appraisal has informed the preparation of the Local Plan at each stage is summarised in the Council's [Matter Statement 1 \(M1.01\)](#) in response to the Inspectors questions 8 to 10.

2. Preferred option for the distribution of development

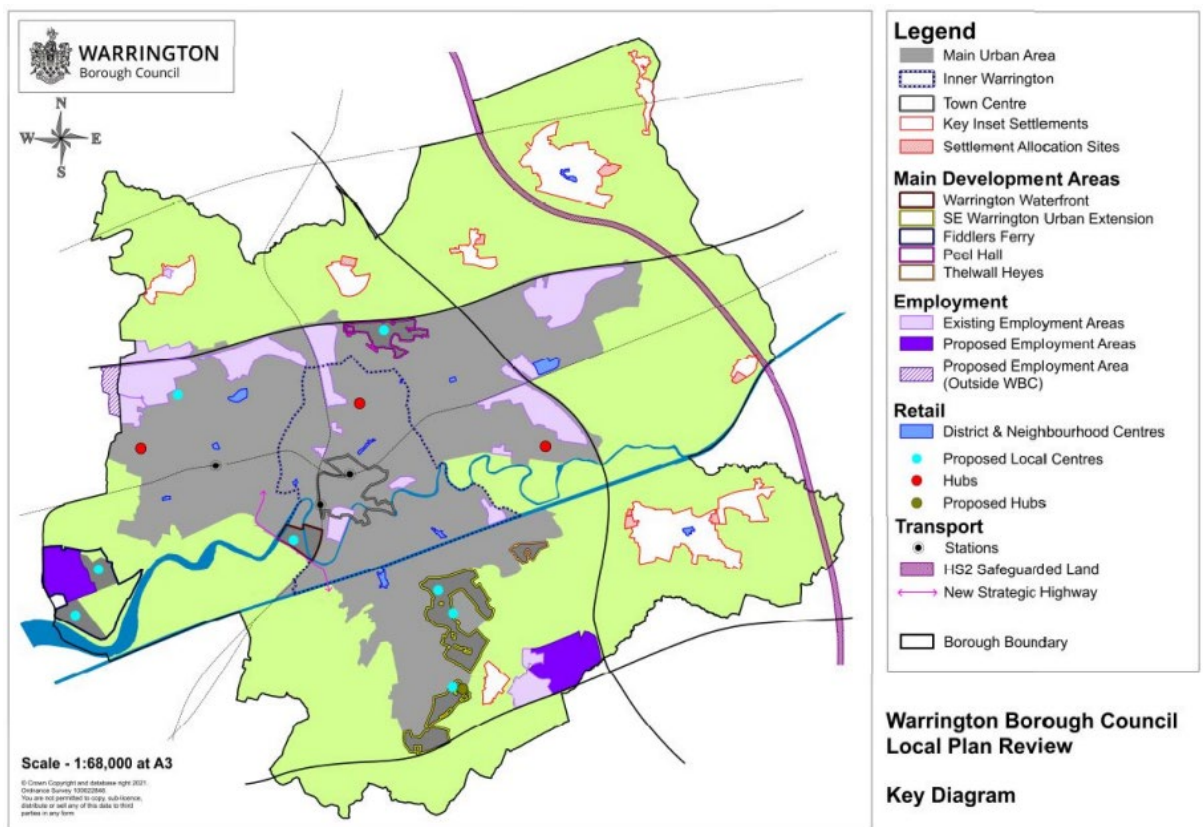
- 2.1 As set out in the Development Options Report, the preferred level of growth for housing (816 homes per annum) and employment land (316.26 hectares of employment land up to 2038) are the minimum that are required to meet Warrington's objectively assessed development needs in full over the plan period.
- 2.2 In terms of the options for the distribution of housing growth, in each option the development capacity of the existing urban area is maximised and constant. The regeneration of the existing urban area, including inner Warrington and the Town Centre, is a key priority of the Council and this has been carried forward from the 2014 adopted Local Plan Core Strategy. The options therefore relate to the distribution of housing from Green Belt release. The preferred option that was selected was for the majority of Green Belt release being accommodated adjacent to main urban area with 'incremental growth' in outlying settlements.
- 2.3 In terms of the urban capacity, which was a constant, this constitutes the majority of development capacity (accounting for 11,785 homes). Of this capacity there are approximately 4,500 homes that already have planning consent, including the large sites at Peel Hall and Omega/Lingley Mere adjacent to the M62.
- 2.4 In addition, there is 21.41ha of employment land within the urban area, at Omega and Birchwood that already has planning consent.
- 2.5 In terms of the Green belt allocations, the selected sites consist of urban extensions to the south east of Warrington (the SEWUE) of around 2,400 homes in the Plan Period (Policy MD2), development of Fiddlers Ferry opportunity site for 1,300 homes in the Plan Period (Policy MD3) and development at Thelwall Heys of 310 homes (Policy MD5).
- 2.6 In terms of the options for the distribution of employment growth, five broad locations for employment were considered:
- Option 1: Land at M56 Junction 9 (Total provided is based on consolidation of a number of individual sites into a strategic employment location,). Approximately 145ha, with a potential further 70ha at a northern extension
 - Option 2: Land at Warrington Waterfront (Port Warrington site, Business hub/Commercial Park)
 - Option 3: Land adjacent to Omega (Call for sites, Westward extension (within St Helens), further extension in Green Belt 42ha) (**NOTE: Now consented**).

- Option 4: Fiddlers Ferry (approximately 100ha non Green Belt, but requires enabling housing development in the Green Belt)
- Option 5: Birchwood (Total of 47ha of employment land in the Green Belt)

2.7 Options 1, 3 and 4 were selected as the preferred options for the 2021 Draft Plan from which SA/SEA of individual sites within these locations was integral to the selection of proposed sites for the employment allocations – MD3 Fiddlers Ferry and MD6 South East Warrington Employment Area.

2.8 Having identified a preferred option for the Plan, through the options assessment process incorporating SA/SEA, the Council was able to undertake a more detailed assessment of potential impacts on designated sites through the HRA, prior to the publication of the Plan for Regulation 19 consultation.

2.9 The distribution of the proposed allocations is shown on the Local Plan Key Diagram, reproduced below:



3. Consideration of impact on Holcroft Moss

3.1 Holcroft Moss is located immediately to the south of the M62 to the east of the main urban area of Warrington within the Green Belt separating Warrington from Greater Manchester. The in-combination impact on Holcroft Moss arises from increased traffic volumes on the M62, resulting in corresponding increased levels of air pollution.

3.2 It is considered that the vast majority of the additional traffic projected to be generated on the M62 from the Local Plan will come from sites within the existing main urban area. These include the large Peel Hall and Omega sites and the remaining development sites within Birchwood - all immediately adjacent to the M62 - which already have planning permission for residential and employment development as detailed in the table below.

Site	Planning Permission Reference	Site Capacity
Housing		
Proposed allocation at Peel Hall (Policy MD4)	2016/28492 granted on appeal 23/08/2021.	1,200 units
Omega (Phases 4-7)	2019/36241 granted on 24/12/2020. Additional units above original outline consent.	300 units
Omega (Remainder)	Remainder of outline consent (2015/26469) and reserved matters consents still to be built out at start of plan period (2017/29537, 2017/20837, 2018/32124 and 2019/35721)	476 + 264 = 740 units
Lingley Mere (Remainder)	Remainder of reserved matters consents still to be built out at start of plan period (2018/32061 and 2019/36181)	53 units
Total		2,293 units
Employment		
Omega Zone 8	2020/36461 (St Helens Ref: P/2020/0061)	75.43ha
Omega	Remainder of reserved matters consent still to be built out at start of Plan period.	12.7ha
Birchwood	Remainder of reserved matters consent still to be built out at start of Plan period.	8.71ha
Total		96.84ha

Table 1: Large consented schemes in close proximity to the M62

3.3 It should be noted that Natural England did not raise objections to any of the planning applications, listed in Table 1 above. They also did not raise any objection to the application for the development of the Six56 application which comprises approximately two thirds of the South East Warrington Employment Area proposed allocation (Policy MD6).

- 3.4 As can be seen on the Key Diagram above, in terms of the Green belt release sites that the Council is proposing to allocate, the main allocations for housing (MD2, MD3 and MD5) and the employment site in south east Warrington (MD6) are all some distance from the M62. Whilst, it is accepted that they will have some impact on traffic generation on the M62, it is considered that they are unlikely to be significant generators of traffic in this direction relative to the development coming forward within the existing main urban area.
- 3.5 Of the non-Green Belt Main Development Area proposed allocations, MD1 (Warrington Waterfront) is some distance from the M62 and there are several other options for accessing the west bound strategic road network that are as close, if not closer to the site than the M62 (ie. M56, A56 and A57). MD4 (Peel Hall) is adjacent to the M62 but this has outline planning permission and as stated above, Natural England did not raise any objection to this application.
- 3.6 A number of the smaller Outlying Settlement sites are in relative proximity to the M62 but these are much smaller in scale and are considered to only have a very small impact on traffic generation on the M62

4. Conclusions

- 4.1 The Council has undertaken a comprehensive options assessment process which has considered the impacts on designated ecological sites through the SA/SEA process and through the HRA process.
- 4.2 The main impact on traffic generation on the M62 is from sites within the existing urban area. This includes a number of large sites in proximity to the M62 which already have planning permission and to which Natural England raised no objection.
- 4.3 With the exception of Peel Hall, which already has outline planning permission, the proposed allocations in the Local Plan are unlikely to have a significant impact on traffic generation on the M62, relative to the development within the main urban area.
- 4.4 The Council considers that undertaking any additional work on the air quality impacts of individual proposed allocation sites would be disproportionate and would only confirm what is obvious from an assessment of the spatial distribution of the proposed allocations set out above.