

Cheshire West & Chester Council

Planning Policy

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CH65 0BE

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

████████████████████
Our ref: Part Two/DTC/Warrington
Your ref:

Please ask for: Gill Smith
██
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Date: 1st December 2016

Dear Sir/Madam,

Warrington Local Plan Review - Regulation 18 Consultation

Thank you for your consultation and the opportunity to comment on the proposed scope for the review as set out in the 'Local Plan Scope and Contents Document'.

Cheshire West and Chester Council adopted its own Local Plan (Part One) Strategic Policies document in January 2015. The purpose of the Part One plan is to provide the overall vision, strategic objectives, spatial strategy and strategic planning policies for the borough up to 2030.

We are now working on the Local Plan (Part Two) Land Allocations and Detailed Policies document which will set out the non-strategic allocations and detailed policies, and consulted on the emerging preferred approach, draft policies and allocations between August and September 2016.

Cheshire West and Chester Council has worked closely with Warrington Council during the preparation of the Local Plan (Part One) in identifying and resolving the key, strategic, cross-boundary issues, and a statement was agreed between the two authorities as part of the Local Plan (Part One) examination which summarised these issues as:

- Housing
- Economy
- Green Belt
- Gypsies and Travellers
- Minerals and Waste

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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