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WARRINGTON
Borough Council

Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Response from Moore 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?

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 and 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.

The Preferred Development Option assumes a housing need of 955 homes per annum (paragraph 2.8 of that document) which it then increases to 1,113 homes per annum to support the jobs growth proposed in the Cheshire & Warrington devolution bid.

Moore 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.

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'?

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

Question 4

Do you agree with the new Local Plan Objectives?

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 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?

The Sustainability Appraisal is deficient in a number of respects, for the reasons detailed in our accompanying response. Unless further work is done, the Plan will not be able to pass the 'justified' test of soundness.

The Sustainability Appraisal inadequately considers the contribution that different options would make to infrastructure delivery, ignoring the fact that the Community Infrastructure Levy mechanism removes the need to co-locate development and infrastructure together. The findings of the Warrington Viability Review (July 2017) are not mentioned in the Sustainability Appraisal, despite the fact that infrastructure delivery is a crucial part of the objectives of the Plan. Please see our response to Question 17.

There are also major deficiencies in the Green Belt Assessment, detailed in section 1 of our accompanying response.

Question 6

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

Response:

Contributions to infrastructure by different options

All options can contribute towards the provision of new infrastructure and thereby assist the Council in achieving its aims of new roads and bridges across the River Mersey and Ship Canal. The Community Infrastructure Levy enables developer contributions to be pooled from developments across the borough, making it unnecessary for development to physically adjoin the areas in which new bridges and roads will be located.

The Sustainability Appraisal

The Sustainability Appraisal (SA) 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.

Option 1

We acknowledge that option 1 performs positively against the majority of the plan's objectives.

The SA states, "*the positive effects are most pronounced for options 1 and 2, which are considered more likely to contribute to the New City concept and to secure strategic infrastructure improvements to support the developments and the wider area*" (SA paragraph 4.3.6).

Option 2

We have serious concerns that the negative impacts of option 2 have been under-played. In particular, the south-western urban extension has strongly negative impacts for the reasons given in our accompanying detailed response.

Over-hasty rejection of alternative options

The SA Interim Report (July 2017) 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 Moore village as they are on Winwick village.

An urban extension to the north of Warrington would not cause neighbouring towns to merge, with a good distance remaining between Warrington and Newton-le-Willows. However the urban extension to the south-west of Warrington will cause merging of the urban areas of Warrington and Runcorn.

Green Belt Assessment

We consider that the Green Belt Assessments by Arup (2016) and Additional Assessments by WBC (2017) are inadequate, for the reasons given in section 1 of our accompanying submission. In summary:

- Purpose 3: “to preserve the setting and special character of historic towns” has been inaccurately addressed, with both the Arup and WBC assessments failing to consider the impact of development on the setting and character of the Moore Village Conservation Area.
- Purpose 5: “to prevent neighbouring towns merging into one another” has been inadequately assessed, with the south-western extension greatly reducing the area of undeveloped land between Warrington’s urban edge and Moore village.

Please see our accompanying submission for fuller detail.

Unless the Green Belt evidence base is updated, there is a high risk that the Local Plan will be found unsound at examination stage due to an inadequate evidence base.

Loss of agricultural land

In relation to the loss of agricultural land, we dispute the SA’s finding that, “Each option is predicted to have similar negative effects upon agricultural land, with Grade 2 and 3 land being lost regardless of location.” (paragraph 4.3.7). Option 2 includes the loss of extra land to the south of the Chemical Works that is required as a safety buffer for the south-western urban extension. This increases the amount of land removed from agricultural use, over and above what would be required for the same number of houses at the Garden Suburb in option 1.

Sustainability Appraisal for Warrington Waterfront

The specific impacts of the Port Warrington proposals have not been adequately assessed, as set out in section 4 of our accompanying response.

Sustainability Appraisal for South West urban extension

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 sections 2 & 3 of our accompanying response.

Question 7

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

Response:

No, we do not agree with the Preferred Development Option.

Moore Parish Council strongly object to Option 2 because it would dramatically reduce the gap between Warrington and Runcorn urban areas, creating almost continuous built-up area between the two towns.

One of the purposes of the Green Belt as defined in the National Planning Policy Framework is, “*to prevent neighbouring towns merging into one another*”. The Preferred Development Option is totally contrary to this intention behind the Green Belt.

Please see our response to Questions 10, 12, 17 and the attached submission for further details.

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?

Response:

Please see our detailed response in the attached submission

Question 11

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

Response:

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

Question 12

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

Response:

Please see our detailed response in the attached submission

Question 13

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

No comments at this stage.

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?

No comments at this stage.

Question 16

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

No comments at this 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 the National Planning Policy Framework. This has been inadequately considered to date, and has a significant impact on the Preferred Option. Please see section 2 of our attached response for details.

Funding of Infrastructure

The Preferred Development Option is not specific about how infrastructure such as roads, bridges, schools, etc will be funded. In the Council's draft Planning Obligations Supplementary Planning Document (SPD) published July 2016 it 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.*" (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 even 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 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.

We note that the sensitivity analysis in the Viability Review assumes a growth in house prices of 2% per annum and that this results in figures of £39,296 per dwelling for incremental growth in outlying settlements compared to £40,786 per dwelling for an urban extension towards the latter part of the plan period. However under the sensitivity analysis the large garden suburb option would yield £63,181 per dwelling towards infrastructure and therefore on these figures, the garden suburb is the best option for delivery of infrastructure.

It is our contention that the 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 section 3.4 of our submission.

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).

Please refer to our attached response for:

- 1. The Green Belt Evidence Base – response to Questions 5 & 6**
- 2. Impact on Heritage Assets – response to Question 17**
- 3. South West Urban Extension (site R18/125) – response to Question 12**
- 4. Port Warrington (Site R18/133) – response to Question 10**
- 5. Conclusions**

BERRYS

PROPERTY | BUSINESS | PLANNING

REPRESENTATIONS ON THE WARRINGTON LOCAL PLAN

SUPPORTING EVIDENCE BASE & SITE SPECIFIC PROPOSALS

on behalf of

Moore Parish Council

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This report accompanies Moore Parish Council's response to the Preferred Development Options consultation

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- 1. The Green Belt Evidence Base – response to Questions 5 & 6**
- 2. Impact on Heritage Assets – response to Question 17**
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1. THE GREEN BELT EVIDENCE BASE

Introduction

The Council's proposals to remove land from the Green Belt are founded on two evidence base documents undertaken by Arup (October 2016) and Warrington Borough Council (July 2017).

The five purposes of the Green Belt set out in paragraph 80 of the National Planning Policy Framework are:

- to check the unrestricted sprawl of large built-up areas;
- to **prevent neighbouring towns merging into one another**;
- to assist in safeguarding the countryside from encroachment;
- to **preserve the setting and special character of historic towns**; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Our main concerns relate to deficiencies in the evidence base in relation to measuring purposes 2 and 4. There are fundamental omissions in the Green Belt Assessment that render it highly vulnerable at the Local Plan examination stage, namely:

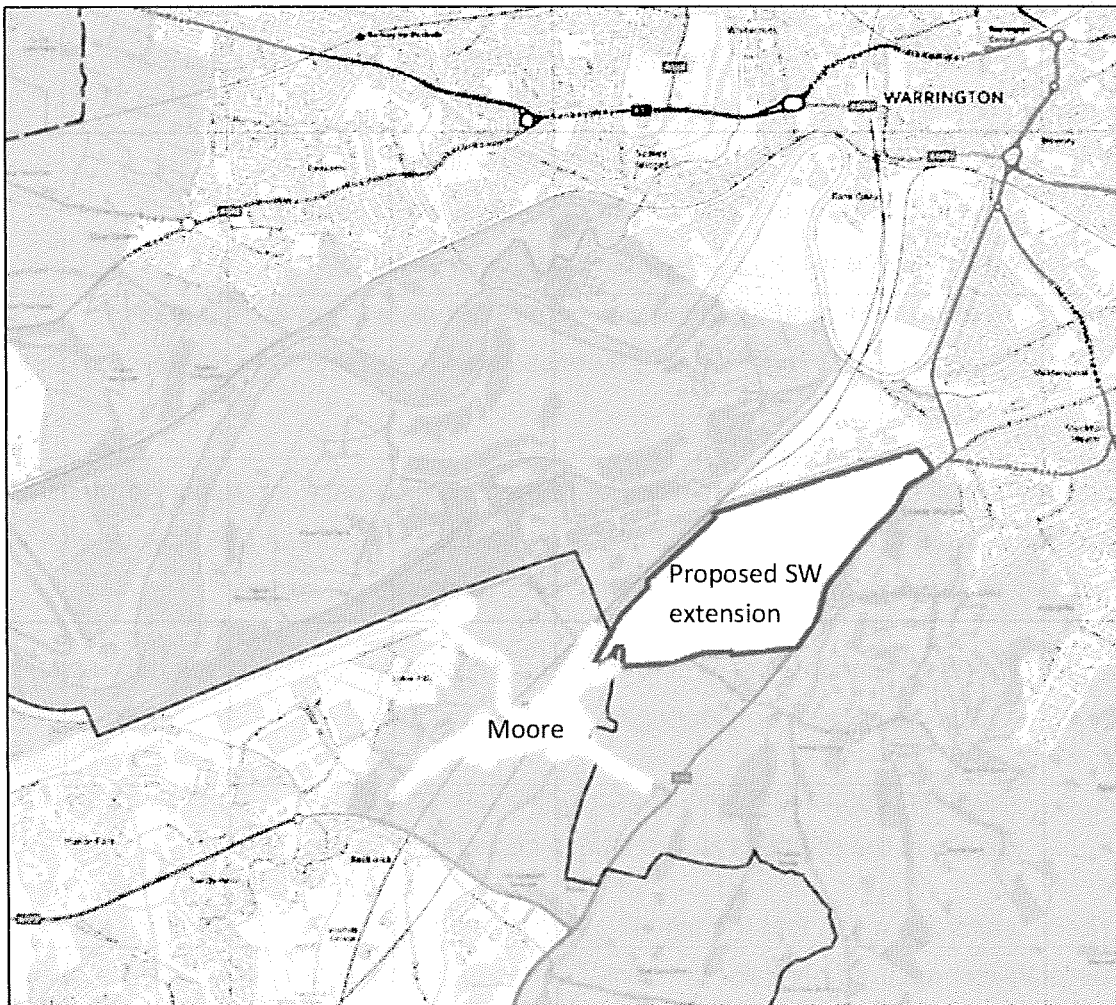
1. There is a fundamental error in failing to acknowledge that development west of the A56 would cause neighbouring towns to almost merge.
2. There has been a factual omission in failing to consider the role of the Green Belt in relation to the setting of Moore Village conservation area.

These omissions mean that the overall assessment of the value of Green Belt parcels is currently incorrect. 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.

1.1 Impact on the merging of Runcorn and Warrington

One of the purposes of the Green Belt as defined in the National Planning Policy Framework is, "to prevent neighbouring towns merging into one another". Development west of the A56 would lead to continuous urban development between Runcorn and Warrington. This would be totally contrary to the purpose of the Green Belt.

Figure 1: The Green Belt between Runcorn and Warrington



The representations by Peel Holdings Ltd (R18/125) suggest they would include a buffer of between Warrington's urban edge and Moore 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 Moore. 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, as discussed in more detail in section 3 of this response.

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.

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

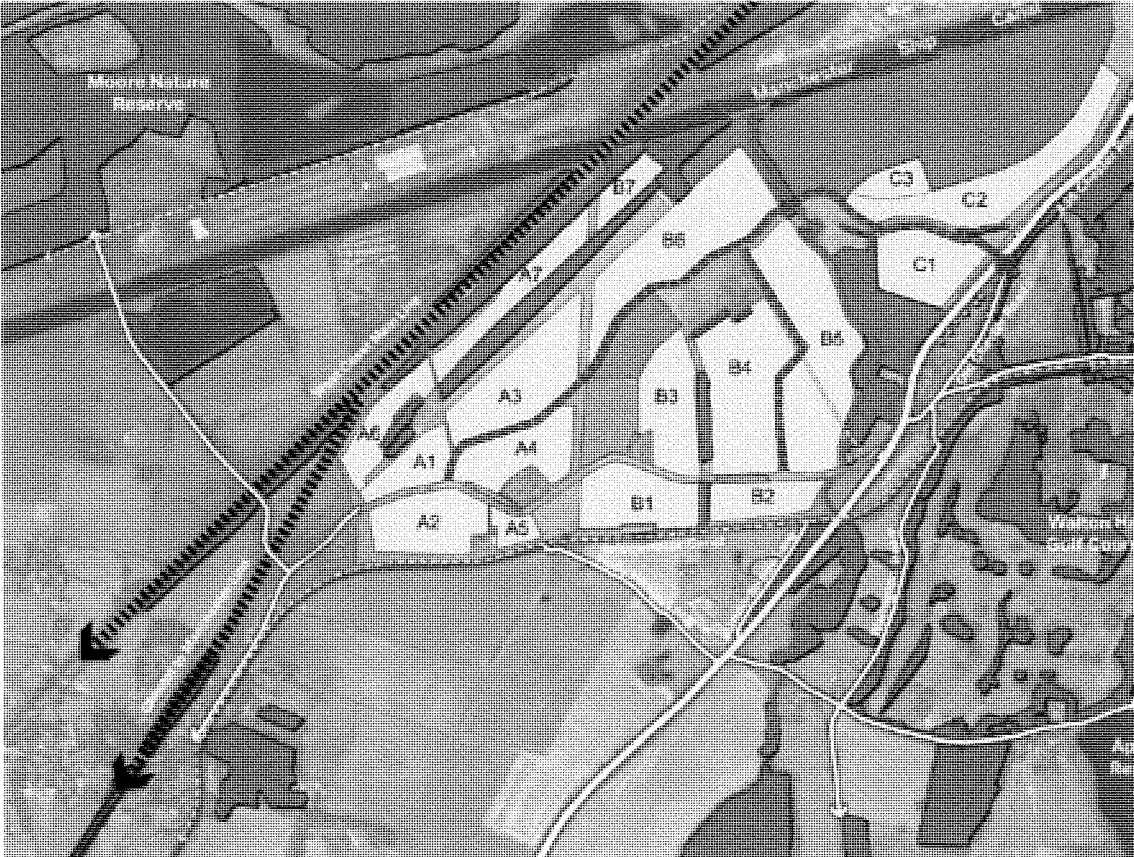


Figure 3.6: Framework Plan Option 1

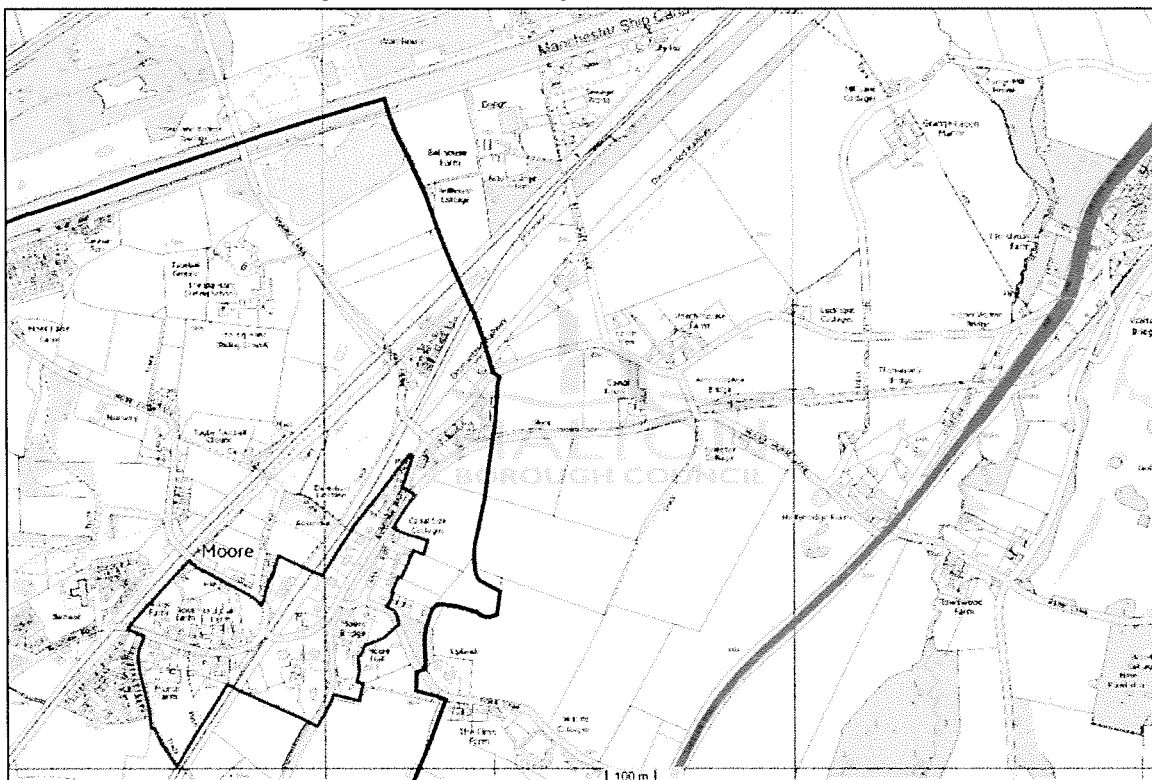
1.2 Impact on the setting and special character of an historic village

National policy establishes that the Green Belt serves a number of purposes including, “to preserve the setting and special character of historic towns.” This extends to historic villages, as acknowledged by the Arup study in their inclusion of the role of the Green Belt in relation to the Walton Village Conservation Area in their assessment of parcel WR65.

The Council appear to have overlooked the existence of the Moore Village Conservation Area and in this regard their Green Belt Assessment of parcels WR65 and R18/125 are inaccurate.

The Green Belt Assessment by consultants Arup (October 2016) only acknowledges the Walton Village Conservation Area and ignores the fact that development west of the A56 will have more impact on the historic setting of the Moore Village Conservation Area.

Figure 3: Moore Village Conservation Area



1.3 Contribution of Green Belt parcels

The areas of land assessed around Moore are summarised in figures 4 & 5 and tables 1 & 2 below. Parcels WR65, R18/005, R18/125 and R18/133 are identified as having a 'moderate' contribution to the purposes of the Green Belt while Parcel WR72 is identified as having a 'weak' contribution.

Figure 4: Green Belt parcels (Arup, October 2016)

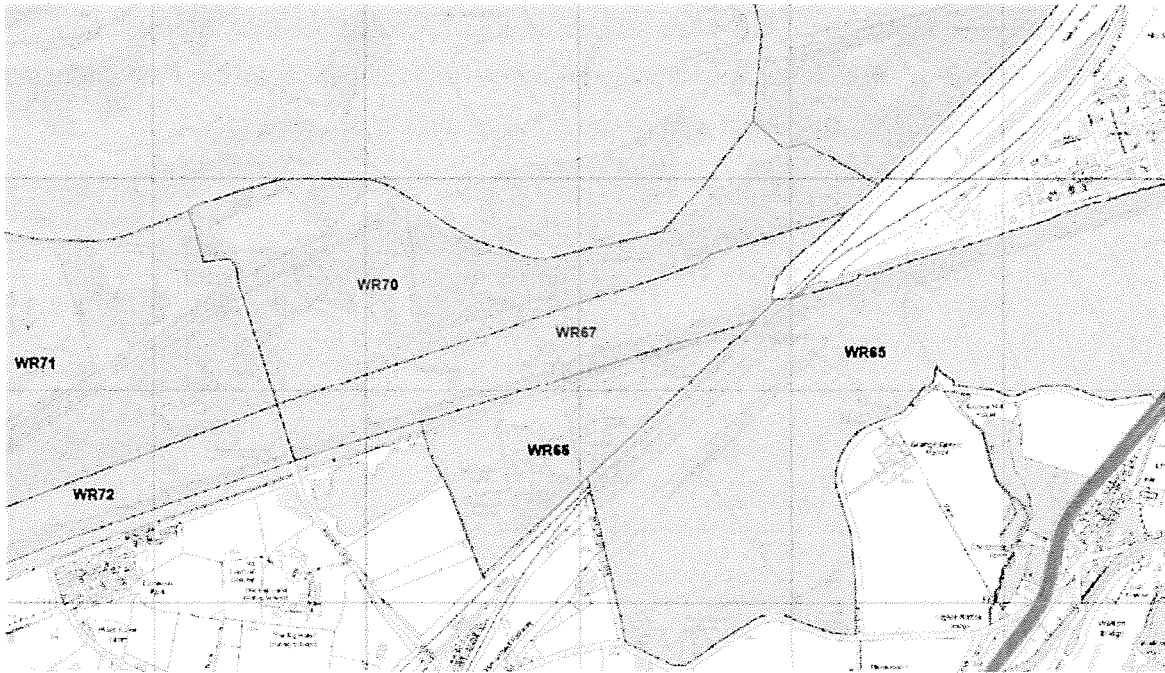
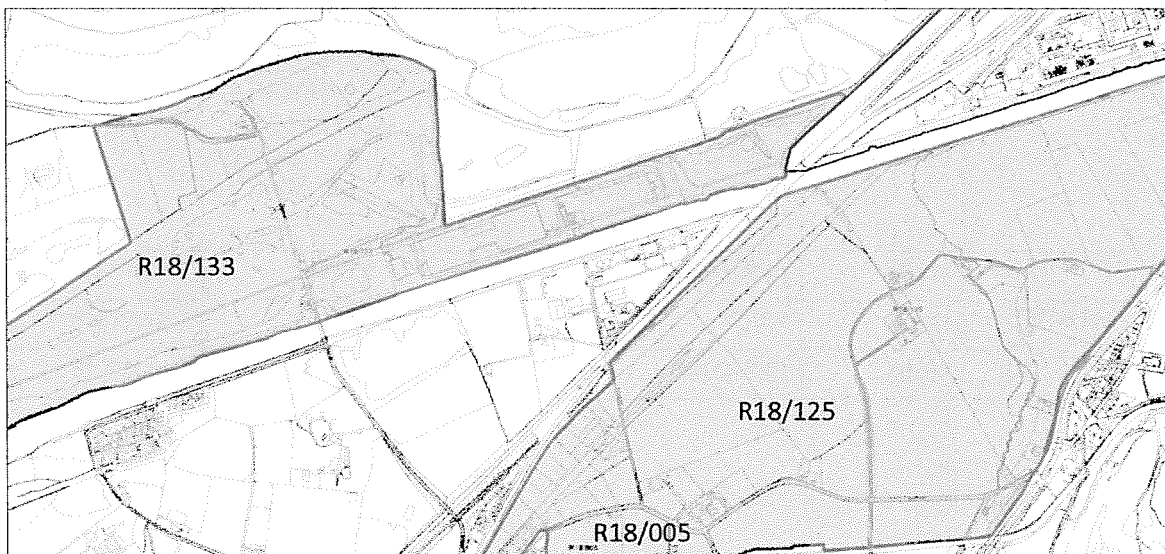


Figure 5: Additional Green Belt Assessments (WBC, July 2017)



A summary of the scores against the purposes of the Green Belt is provided in table 1 below. Purpose 5 was the same for all parcels in the borough (moderate contribution) and is therefore not shown in the table.

Purposes 2 and 4 are consistently under-estimated, down-playing the role of the Green Belt in preventing Runcorn and Warrington from merging and ignoring the role of the Green Belt in preserving the setting of the historic village and designated Conservation Area of Moore.

Unless this is corrected, there is a high probability that a Local Plan Inspector will find the Green Belt Evidence base to be inadequately prepared, and consequently the Plan could fail against the '*justified*' and '*consistent with national policy*' tests of soundness.

Table 1: Summary of Arup report

	Purpose 1: check sprawl	Purpose 2: prevent neighbouring towns merging	Purpose 3: safeguard countryside from encroachment	Purpose 4: preserve the setting of historic towns	Overall contribution
WR65	moderate	moderate	strong	moderate	moderate
WR66	None	Moderate	weak	none	weak
WR67	weak	weak	weak	none	weak
WR70	weak	moderate	strong	none	strong
WR71	none	moderate	strong	none	strong
WR72	none	weak	moderate	none	weak

Table 2: Summary of WBC Additional Site Assessments

	Purpose 1: check sprawl	Purpose 2: prevent neighbouring towns merging	Purpose 3: safeguard countryside from encroachment	Purpose 4: preserve the setting of historic towns	Overall contribution
R18/125	weak	moderate	strong	none	moderate
R18/005	none	weak	strong	none	moderate
R18/133	weak	moderate	moderate	none	moderate

2 IMPACT ON HERITAGE ASSETS

Moore has a rich history and a strong character that has been well preserved over the past century, as illustrated in figure 8 overleaf. In addition to the Conservation Area, there are 12 listed buildings in Moore Village, plus the swing bridge and 3 bridges involving the Bridgewater Canal as shown in figure 7 overleaf. The setting of these heritage assets, as well as the setting of the conservation area, is strongly protected in law.

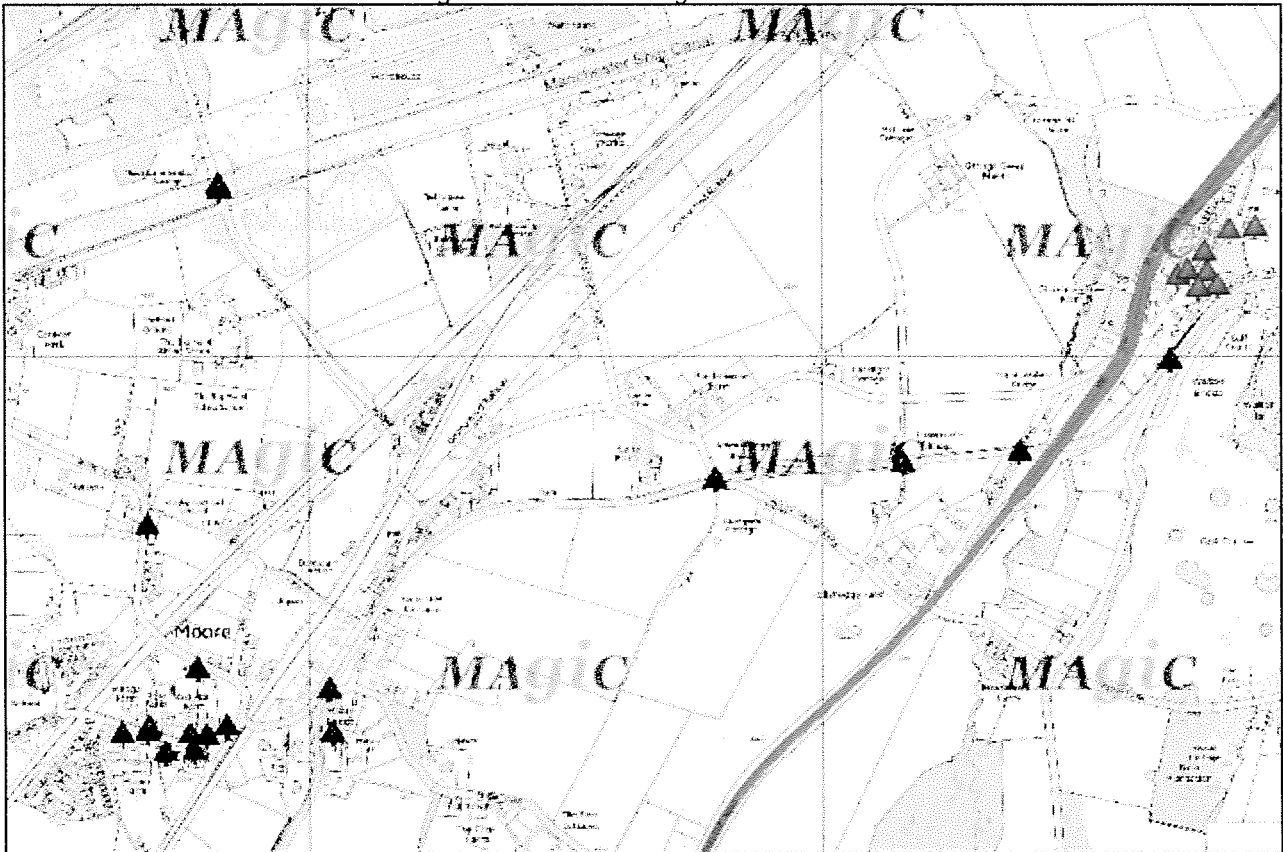
The SW Warrington Development Concept published by Warrington Borough Council (figure 6 below) fails to recognise the Moore Conservation Area and differs from Historic England's record in not identifying Acton Grange Bridge as a grade II listed building. It is inadequate in its assessment.

Figure 6: Extract from SW Warrington Development Concept – ignores Moore Conservation Area



Figure 2.11: Historic Assets Map

Figure 7: Listed buildings & structures



Grade II* listed buildings

Moore Hall

Grade II listed buildings & structures

Moore Bridge

Ivy Cottage

Old Hall Farmhouse

Old Hall Farm Cottages

The Pebbles

The Red Lion Public House

Village Farm House

Gate and Walls to Village Farm House

Manor Farm House

Briardene Roselea

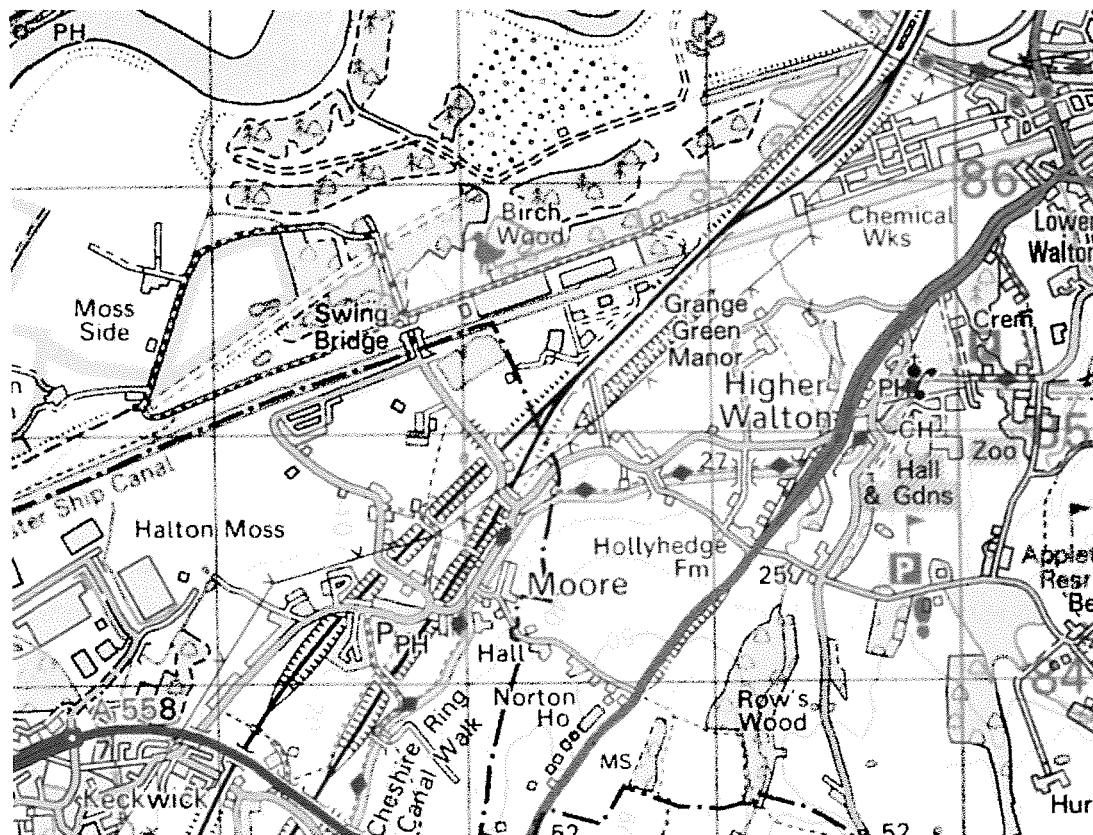
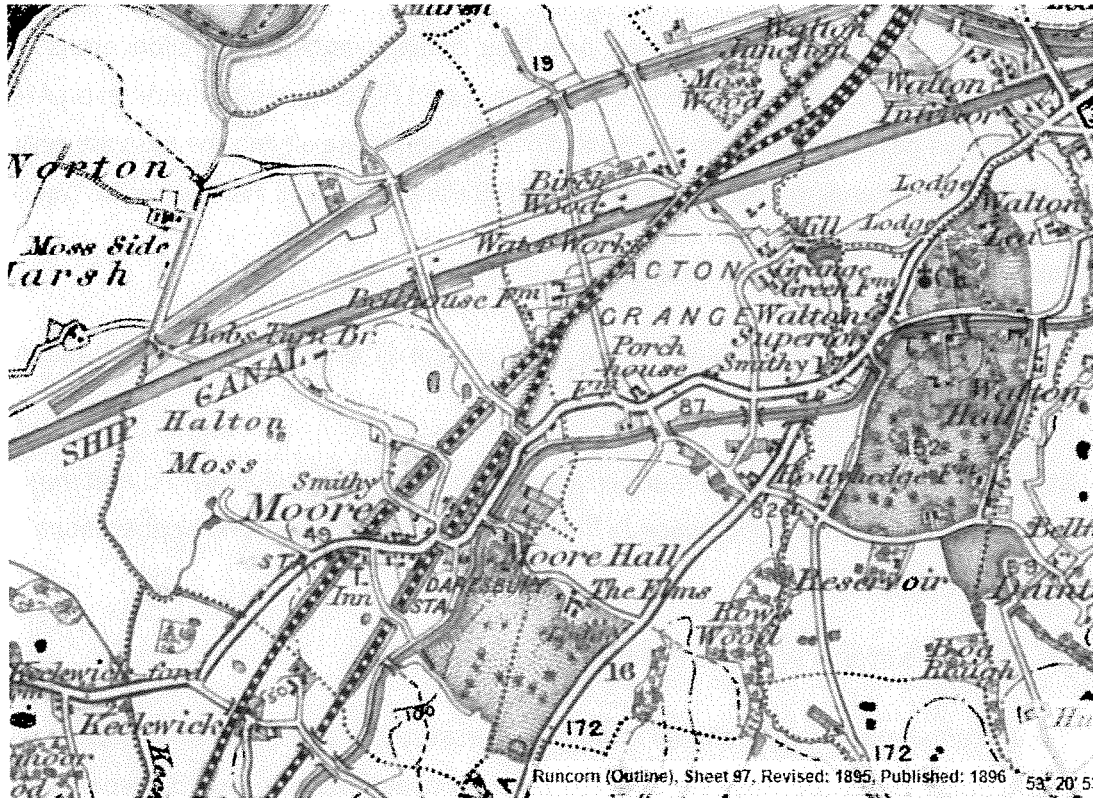
Moore Lane Bridge over Manchester Ship Canal

Acton Grange Bridge

Thomasons Bridge over Bridgewater Canal

Aqueduct carrying the Bridgewater Canal over Chester Road

Figure 8: Comparison with 1896 map



2.1 Legal protections

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)

2.2 National policy on heritage assets

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.” (NPPF Paragraph 129)

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 comply with national policy, the proposals for the South West Warrington urban extension should therefore be accompanied by a Heritage Impact Assessment and an assessment of Historic Landscape Character. This does not appear to have been done.

2.3 Impact on the setting of Moore village

The setting of heritage assets is important, as part of the historic significance of heritage assets is conveyed by their context. For example, the historic character of Moore village Conservation Area is related to the development of the Bridgewater Canal, the development of railways and the relationship between the village and the River Mersey and Ship Canal. Consequently the Plan must consider the effect of its proposals on the setting of Moore village.

National Planning Policy Guidance states:

"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals"
(Paragraph: 009 Reference ID: 18a-009)

The setting of Moore Village Conservation Area, including the historic relationships between Moore and its neighbours and surrounding landscape, is vital to its historic significance. The area has a rich history dating back to the Roman Road (now the A56) built in 84AD. More recent history includes the first UK tractor trials, held at Acton Grange in April 1917, at a time when food supplies were critical. The historic significance of the area over the past 20 centuries needs to be considered in depth.

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.

As a minimum, the proposals for the South West Warrington urban extension should be accompanied by:

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

3 SOUTH WEST URBAN EXTENSION (R18/125)

Moore Parish Council strongly object to the proposed urban extension for six 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 Moore Village Conservation Area and the many listed buildings in the area;
3. The urban extension will have an unacceptable impact on landscape character;
4. Environmental considerations on this particular site will reduce the developer contributions that can be achieved and in consequence reduce the deliverability of new infrastructure;
5. The SW urban extension has poor sustainability credentials;
6. There will be an unacceptable impact on local roads, which are narrow with footways on only one side and not suitable for additional traffic.

These are considered in turn below.

3.1 Gap between Runcorn and Warrington

One of the key purposes of the Green Belt is to prevent neighbouring towns from merging. The proposed south-western urban extension will effectively result in a continuous line of development from Runcorn to Warrington, as described in section 1 of this submission. Once lost, it is gone forever and will have a permanent, detrimental impact on the character of both towns.

It is not necessary to close the gap between the towns, nor is it justified or in accordance with national policy. The Council's objectives can be met by focusing development where it will allow the separation between Warrington and Runcorn to be retained, for example by pursuing Option 1.

3.2 Impact on heritage assets

The Council have entirely failed to consider the impact of the south west urban extension on heritage assets, as addressed in section 2 of this submission. The proposed SW urban extension will impact on the character of the Moore Conservation area and the character of the Bridgwater Canal area with its many listed buildings.

In summary, the Plan is unsound without a full Heritage Impact Assessment on the Moore Conservation Area and the multiple listed buildings & structures in the area, including impact on their settings, together with an assessment of Historic Landscape Character.

3.3 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).

Accordingly there should be a suitable assessment available for the Warrington South West Urban Extension (WSWUE) proposals (also referred to on the Council’s website as the South West Warrington Urban Extension – Development Concept)¹.

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 overleaf. 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 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/>

3.4 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 cross-subsidise new 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).

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

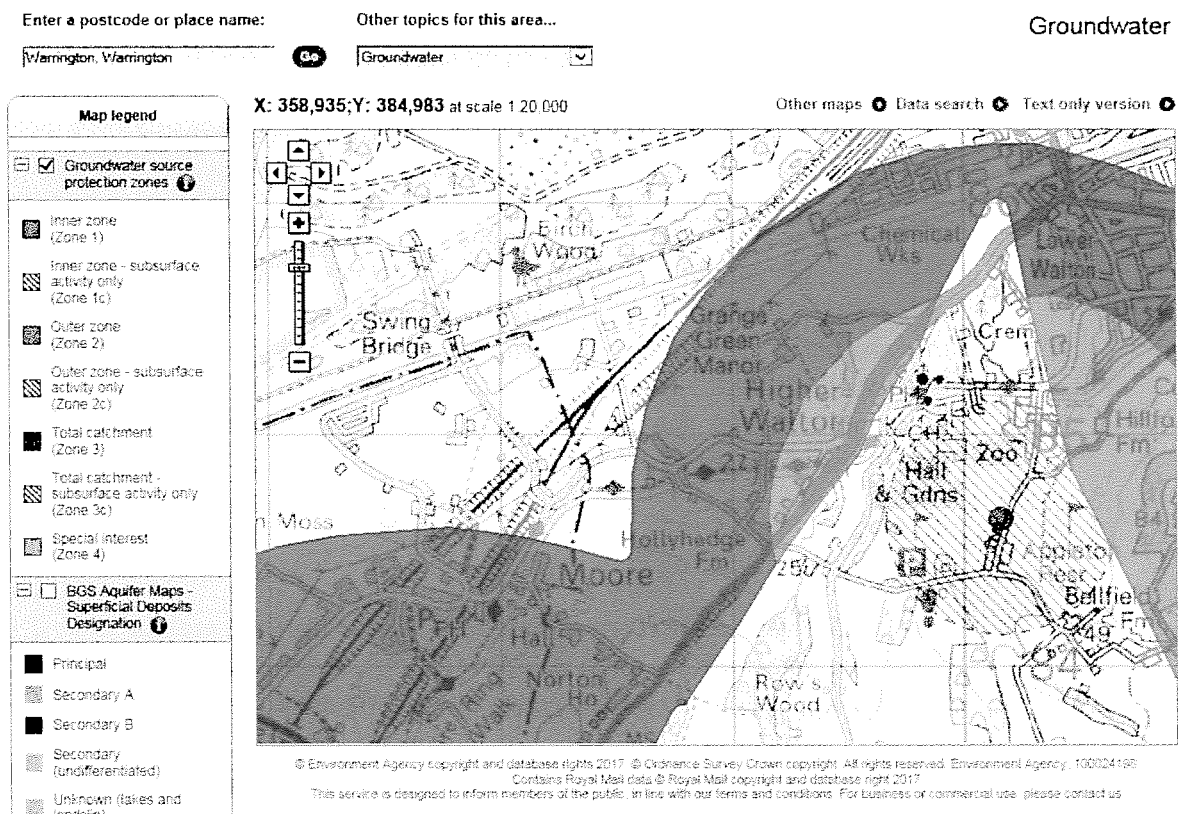


Figure 11: Extract from SW urban extension Development Framework



Figure 2.12: Utilities Constraints Map

3.5 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	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>
NR4	83% of the site overlaps with groundwater source protection zone 3 and 15% overlaps with protection zone 2.
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 section 3.3 above.

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	<p>The assessment ignores the impact on the setting of the Moore conservation area.</p> <p>The SA inaccurately refers to the A55 when in fact the relevant road is the A56.</p> <p>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.</p>

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.

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 ANGST¹ 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

3.6 Highways Impact

The roads in this area are narrow and constrained by the various canal and railway crossings. There is a 7.5 tonne weight limit on Runcorn Road. The narrowness of the historic roads means a footway is only available on one side of the road throughout most of Moore village and up to the A56.

Residents of the proposed SW urban extension will inevitably use the local road network, including the roads through Moore, which are not suitable for the quantity of traffic envisaged. The 'S' bend in the village where the road crosses the railway and then splits to Moss Lane is a particular bottleneck.

Given the historic character of Moore village, the options for widening roads are very limited. It is not possible to accommodate traffic without damage to the character of the conservation area.

A full traffic impact assessment is required that accurately identifies the proportion of future journeys that will be in a south-western direction towards Runcorn.

Any problems on the A56, whether caused by accidents or roadworks, results in significant increases in traffic through Moore Village. This will increase dramatically if the south-west urban extension proceeds.

There have been problems in the past with high sided vehicles hitting the railway bridge. Both Moore Bridge and Acton Grange Bridge on the canal have had significant damage in recent years, caused when large vehicles follow satnav to escape traffic problems on the A56. Such problems are likely to increase proportionately if the south-west extension proceeds.

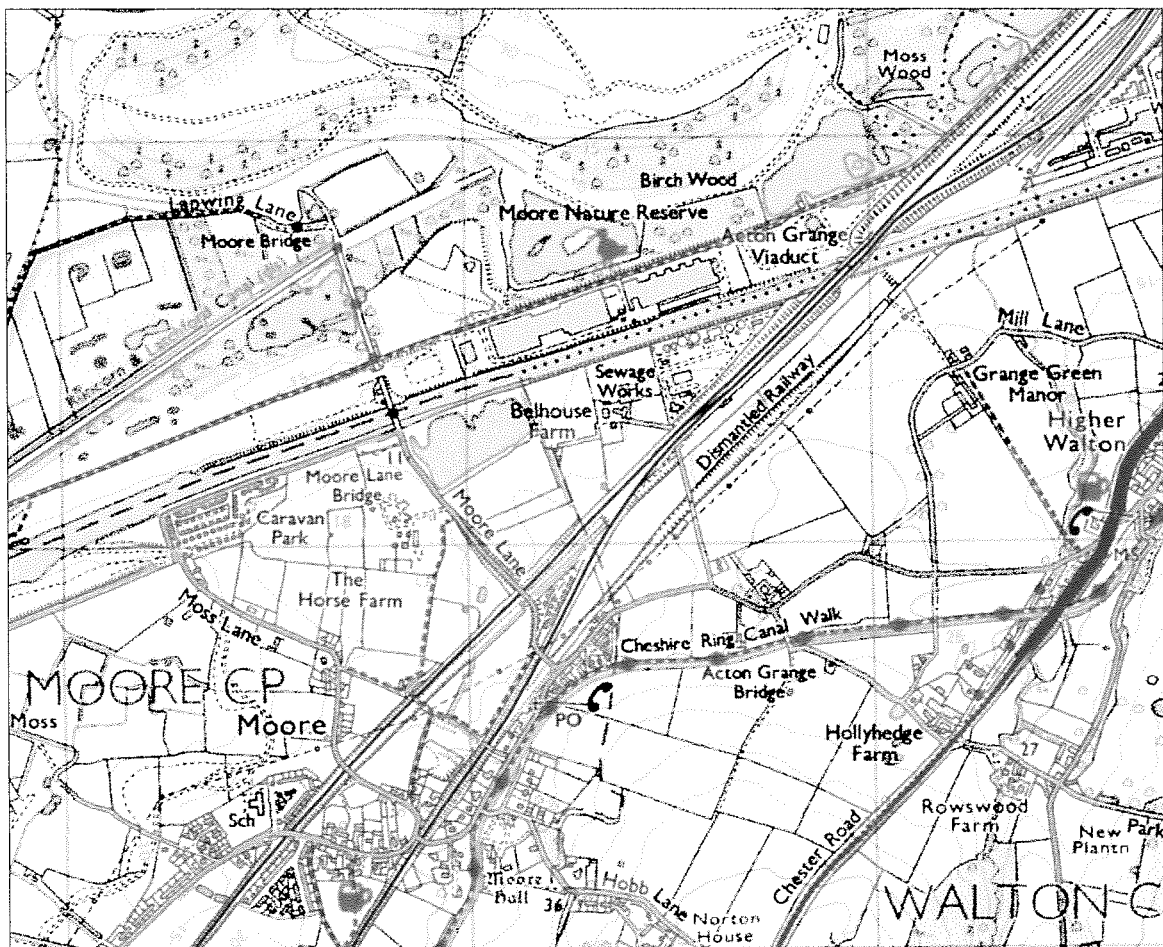
Local highways impacts have not been adequately addressed and are poorly reflected in the Council's sustainability appraisal. They require more detailed consideration.

4 PORT WARRINGTON (SITE R18/133)

Introduction

Of great concern to Moore Parish Council are the Port Warrington proposals for a large distribution centre with around 200,000 square metres of warehousing and facilities on land adjoining the Ship Canal, to create a 24/7 operational port. This would have a significantly detrimental impact on the environment that has not been fully assessed and mitigated. Concerns addressed below are:

1. Lack of conformity with national policy and inadequate sustainability appraisal
2. Ecological impact on the Moore Nature Reserve
3. Inadequate attention to the loss of recreational value
4. Transport impacts
5. Residential amenity impacts on Promenade Park, Moss Lane



4.1 National policy and sustainability appraisal

The Local Plan does not currently meet the test of being consistent with the National Planning Policy Framework (NPPF). NPPF paragraph 110 requires that: *“In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value”*.

NPPF paragraph 123 requires Councils to, *“identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”*.

NPPF paragraph 157 requires Local Plans to, *“contain a clear strategy for enhancing the natural, built and historic environment”*. This must include protection of the environment along the Manchester Ship Canal, especially around the listed swing bridge and the existing Nature Reserve.

The Council have failed to consider the environmental and amenity value of the Manchester Ship Canal area, with none of their evidence base addressing environmental and amenity value across the local authority area.

Furthermore, the sustainability appraisal that has been done is inadequate. There is no detailed sustainability appraisal of this site in the Council’s Sustainability Appraisal: Technical Appendix A Site Proformas, however a summary chart on page 28 of the SA Interim Report (reproduced overleaf) indicates that site R18/133 performs very poorly (red) against criteria BNH3 ‘Capacity for landscape to accommodate’ and GB3. ‘Potential Impact on Local Wildlife Site’. It also will have impacts (orange) against criteria BNH2 ‘effect upon heritage impacts’ and BHN1 ‘proximity to heritage impacts’.

The site’s environmental performance is particularly damaging to the following Sustainability Appraisal objectives:

- Built and natural heritage: “To protect and improve the quality and character of places, landscapes, townscapes and wider countryside whilst maintaining and strengthening local distinctiveness and sense of place.” – BNH1, BNH2, BNH3
- Biodiversity and Geodiversity: “Protect, maintain and enhance biodiversity and geodiversity.” – BG3 impact on local wildlife site.

Appendix D of the Sustainability Interim Appraisal compares the various employment options including the Port Warrington proposals. This notes that:

Landscape impacts

“Development at Port Warrington and the wider Waterfront area falls within the Mersey Flood Plain, which is characterised by industrial activity. However, parts of this landscape type have become important for wildlife, and present important landscapes against the generally lower quality of the surrounding areas. Port Warrington falls within a local wildlife site and therefore could be sensitive to development. Other parts of the wider Waterfront are less sensitive to development. Overall, there is potential for minor negative effects on landscape character, though it ought to be possible to introduce enhancement measures.” (p93)

Biodiversity impacts

“Port Warrington and the wider Waterfront area are in close proximity to a number of local wildlife sites. In particular, Port Warrington contains parts of a local wildlife site, which could be disturbed during construction and operation of employment development. This presents the opportunity for negative effects on wildlife in the short, medium and long term.” (page 93)

The above overall assessment includes the wide area covered by the Warrington Waterfront proposals, which underplays the specific impact of the Port Warrington proposals for allocation of land that currently forms Moore Nature Reserve. As such, the SA is too broad-brush and inadequate to fully assess the multiple sites included in the Warrington Waterfront proposals.

In summary, the specific impact of the Port Warrington proposals have not been adequately assessed and the Plan does not currently conform to national planning policy.



4.2 Ecological impact on the Moore Nature Reserve

Land either side of the Manchester Ship Canal is an environmental resource that is enjoyed by many residents from both Halton and Warrington Borough Council areas. Moore nature reserve covers about 200 acres and has extensive footpaths including walks along the River Mersey and Ship Canal. It has a diverse range of habitats, including lakes, woodland, heath and grassland, with rich flora including several species of orchid. There is abundant insect and bird life. It is heavily used by many for leisure purposes and forms a valued green lung for Warrington.

As a minimum, a full ecological assessment of the Moore Nature Reserve is required. Any future development will require a full Environmental Impact Assessment (EIA) and it is essential that any fundamental problems are fully scoped as part of the Local Plan process.

4.3 Loss of recreational value

The Council have failed to consider the environmental and amenity value of the Manchester Ship Canal area, with none of their evidence base addressing environmental and amenity value across the local authority area.

The area is heavily used by a wide range of residents, schools groups, anglers, bird watchers, tourists and walkers.

The recreational uses of the site must be fully assessed and suitable measures taken to ensure no net loss of recreational value.

4.4 Transport impacts

The rural roads to the south of the Ship Canal are narrow and entirely unsuitable for higher volumes of commercial traffic. Furthermore, the historic swing bridge is a listed structure and cannot take too much heavy traffic.

To avoid unacceptable impacts, it is essential that any development along the northern bank of the Manchester Ship Canal should be accessed by roads from the north.

The infrastructure improvements being sought by Warrington Borough Council as part of the comprehensive development of the Waterfront area facilitate the provision of new road links from the north of the canal. The Local Plan must make explicit that any further development at Port Warrington will rely on these new roads.

4.5 Impacts on Promenade Park, Moss Lane

The proposals would have a detrimental impact on the 80 homes at Promenade Park, Moss Lane, Moore. These lie directly opposite the proposed port and warehousing facility with the only buffer being open water on the Manchester Ship Canal. The Port Warrington proposals will have an unacceptable impact on their residential amenity due to noise and visual impacts.

The National Planning Policy Framework requires that: *“Planning policies and decisions should aim to: avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development”* (NPPF paragraph 123)

A noise assessment with suitable mitigation measures should be submitted by Peel Developments in relation to their proposed development.

Figure 13: Aerial photograph of Promenade Park in relation to the Ship Canal



There is also strong potential for conflict between the security needs of a Port and the interests of residents. For example, landscaped screening is highly beneficial to residents and those enjoying the nature reserve, but in the past Peel Developments have argued in relation to other ports in its portfolio that visual screening and landscaping reduces security.

It is essential to have a landscaped buffer between any commercial development on the north bank and the Ship Canal. The open water of the Manchester Ship Canal is insufficient to buffer noise and visual impacts and the proposals in their current format will have an unacceptable impact on residential amenity.

Moore Parish Council strongly object to the principle of the proposed commercial development opposite Promenade Park. Without prejudice to this position, any allocation of the site in the Local Plan should be accompanied by clear policies that guarantee that mitigation measures will be put in place to protect the residential amenity of residents at Promenade Park.

4.6 Port Warrington Conclusions

The proposals for commercial development along the Ship Canal have been poorly thought through. There is an inadequate evidence base, with no ecological survey, no assessment of impact on the site's current recreational value, no noise assessment, no landscape & visual impact assessment, no details regarding vehicular access routes, and no detailed sustainability appraisal.

Other options exist for port facilities on the Ship Canal, including sites in Halton Borough Council. Peel Developments own consultation draft Mersey Ports Master Plan (2011) identified 746 acres of land for expansion of its port facilities, of which the Port Warrington Phase 2 proposals comprise just 24 acres. This site is one of the most environmentally sensitive of the various sites in the 746 acre land portfolio.

No evidence has been provided that alternative locations have been investigated by Warrington Borough Council. Alternatives for commercial port facilities on the Ship Canal have not been adequately explored with neighbouring local authorities and there is no evidence that this issue has been considered under the 'Duty to Cooperate'. Consequently the proposals are not adequately justified and will fail the 'tests of soundness' when considered in greater depth at the Local Plan examination.

5 CONCLUSIONS

Moore Parish Council strongly object to the Preferred Development Option which in summary:

- Will not pass the tests of soundness as Option 2 is not properly justified;
- The Sustainability Appraisal's assessment of the contributions towards infrastructure of each option is deficient, ignoring the nature of the Community Infrastructure Levy and giving inadequate attention to the Warrington Viability Review (July 2017);
- The Green Belt Assessment has major omissions;
- The SW urban extension proposals are inconsistent with national policy and legislation in relation to the protection of heritage assets;
- There is no Landscape & Visual Impact Assessment for the SW urban extension, contrary to NPPF paragraph 170;
- Fails to consider the residential amenity of the 80 homes at Promenade Park, Moss Lane, Moore, opposite Port Warrington;
- Has not assessed the ecological and recreational value of the Moore Nature Reserve;
- The Sustainability Appraisal, Interim SA Report (July 2017) is inadequate, particularly in regard to its assessment of the SW urban extension and Port Warrington proposals;
- Alternatives for commercial port facilities on the Ship Canal have not been adequately explored with neighbouring local authorities under the 'Duty to Cooperate';
- Will result in the merging of Runcorn and Warrington urban areas if the south-west extension goes ahead.

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.