**REPORT TO:** Executive Board

**DATE:** 14 December 2017

**REPORTING OFFICER**: Strategic Director – Enterprise, Community & Resources

PORTFOLIO: Physical Environment

SUBJECT: Response to Warrington Local Plan Consultation

WARDS: All Wards

#### 1.0 PURPOSE OF THE REPORT

- 1.1 Warrington Borough Council has recently undertaken public consultation on their 'Preferred Development Options' for its replacement Local Plan. Warrington's proposals raise significant issues that affect Halton.
- 1.2 This consultation ended on Friday 29<sup>th</sup> September. Given the timescale, it was not possible to bring a report to Members prior to the close of the formal consultation period. A 'holding response' by Officers was submitted. This report seeks endorsement of a formal response to Warrington.
- 2.0 RECOMMENDATION: That Executive Board endorses the response (Appendix A) to the Warrington Local Plan Preferred Development Options Consultation (Appendix B).

#### 3.0 SUPPORTING INFORMATION

3.1 Warrington has published 'Preferred Development Options' for a period of public consultation (Appendix B), together with evidence base and supporting documentation. This consultation document contains 'summary information' about the level of housing and employment development Warrington intends to plan for, together with diagrammatic representations / conceptual masterplans for the key development areas.

#### 3.2 The proposals include;

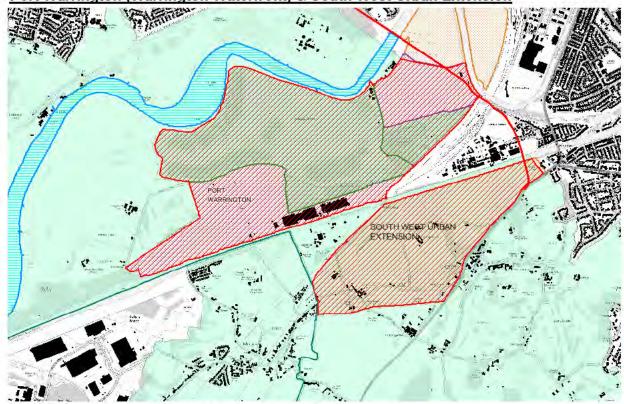
- 22,260 dwellings (20 years at 1,113 per annum)
- 381 ha. of employment land accommodating jobs growth of 31,000.
- Green Belt release to accommodate 8,791 dwellings and 251 Ha. of employment land.

The proposed development areas include,

Development Area	Dwellings	Employment Land (Ha.)	Jobs
City Centre	3,526	26.95	
Other Urban	4,869	92.42	
Garden City Suburb	7,274	116.8	
South West Urban Extension	1,831		
Warrington Waterfront	4,032	110.23	7,000
Outlying settlements	1,190		

3.3 Halton's principal concerns are the 'Port Warrington' element (75 ha) of the wider Warrington Waterfront proposal and the South West Urban Extension (Walton to Moore). These two proposals see Warrington extend across the Green Belt to join Halton's boundary (see map below).

Extent of Warrington Preferred Development Options Green Belt Release (hatched): Port Warrington (Warrington Waterfront) & South West Urban Extension



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- 3.4 Warrington is at an early stage with its Local Plan, and as such there are significant gaps in the information provided, with the consultation based upon broad development preferences. As such the recommended response (Appendix A) raises general concerns and seeks additional information regarding the potential impacts on Halton.
- 3.5 Warrington intends to have two further consultations, aiming to publish a "draft Local Plan" for consultation in the first quarter of 2018. This will be

followed by another consultation on the "proposed Submission Draft" before the document is submitted to the Secretary of State for Communities and Local Government for examination. Officers from the two authorities will endeavour to find mutually acceptable solutions to address Halton's objections.

#### 4.0 POLICY IMPLICATIONS

4.1 Warrington's proposals include the removal of Green Belt between Runcorn and Warrington, potentially having an impact on possible development options within Halton's own Delivery and Allocations Local Plan.

#### 5.0 FINANCIAL IMPLICATIONS

5.1 As Warrington's Plan progresses, it may be necessary to engage planning consultancy services, either individually or in partnership with others where specialist expertise or independent scrutiny is required.

#### 6.0 IMPLICATIONS FOR THE COUNCIL'S PRIORITIES

#### 6.1 Children & Young People in Halton

A number of Warrington's proposals include provision for additional schools; however this is to meet new, locally arising need, and as such should have no impact on children and young people in Halton.

#### 6.2 Employment, Learning & Skills in Halton

Warrington is proposing employment development for around 31,000 jobs, including development of 100 ha. (7,000 jobs) within the Warrington Waterfront (Arpley Meadows) area. Delivery of the Warrington Waterfront proposal will be dependent upon the delivery of the Warrington Western Link (separate consultation).

#### 6.3 A Healthy Halton

Warrington's proposals may increase the job opportunities available to Halton residents, potentially reducing worklessness with attendant positive health impacts.

#### 6.4 A Safer Halton

No impacts envisaged.

#### 6.5 Halton's Urban Renewal

Warrington is proposing significant new employment development under the 'new city' concept, including the creation of new (Port Warrington / Warrington Waterfront) or expanded employment estates (Omega / Barleycastle). This will increase the competition for inward investment along key corridors, potentially to the detriment of Halton.

#### 7.0 RISK ANALYSIS

- 7.1 Warrington is progressing a pro-development 'New City' concept. Given their locational advantages and strong economic performance, this will increase competition for investment for surrounding boroughs.
- 7.2 Officers will seek resolutions to Halton's concerns. If unsuccessful, Halton may have to lodge and maintain formal objections to Warrington's Plan through to independent examination.

#### 8.0 EQUALITY AND DIVERSITY ISSUES

8.1 Warrington is consulting development principals. No detail is included at this stage to suggest that their Plan will raise any equality or diversity issues for Halton at this stage.

## 9.0 LIST OF BACKGROUND PAPERS UNDER SECTION 100D OF THE LOCAL GOVERNMENT ACT 1972

Document	Place of Inspection	Contact Officer
Warrington Preferred Development Option – Consultation (July 2017)	Municipal Building, Widnes	

# WARRINGTON LOCAL PLAN PREFERRED DEVELOPMENT OPTION (REG 18) CONSULTATION

Halton Borough Council's representations to Preferred Development Options consultation

Concerns principally relate to the Green Belt Gap between Runcorn/Moore (Halton) and Warrington as affected by the proposals for:

- 1. the Port Warrington element of Warrington Waterfront
- 2. South West Urban Extension (SWUE)

Consideration of the 'preferred development option' leads to the inclusion of issues which Halton, as a neighbouring authority, would not normally consider strategic issues, but in this case have a direct bearing on the wider consideration of the Port Warrington and SWUE proposals and alternative patterns of development.

Halton therefore makes comments on the following:

- 3. Supporting evidence base, especially the Green Belt Assessment
- 4. Retail

Halton welcomes more discussion on these proposals, together with alternatives, as Warrington progresses its Local Plan. To aid future discussions a series of questions (1-18) have been framed to assist cooperation between Boroughs. It is acknowledged that this is an initial consultation on broad development options and that significant work remains to be undertaken, which may address many of the issues set out below.

### 1. Port Warrington - Warrington Waterfront

Halton objects to the proposed Port Warrington element of the Warrington Waterfront proposal as currently drafted on grounds a – f, below:

#### a. <u>Green Belt – Merging of Settlements:</u>

The development would result in the physical and perceived merging of Warrington and Runcorn contrary to national Green Belt policy.

#### b. Supporting Evidence – Green Belt Study

The Green Belt Study concludes (for General Area 15), the nearest parcel for which an assessment is provided;

"The GA forms an essential gap between the Warrington urban area and Runcorn in the adjacent neighbouring authority of Halton, whereby development of the whole of the GA would result in the actual merging of the towns."

Of the six Study Parcels covering Port Warrington, the study concluded that four performed a 'strong' green belt function. Regarding the two parcels assessed as having a weak function, Halton disagrees with the assessment of Purpose 1 (see below).

#### c. Supporting Evidence – Need for additional port facilities

It is unclear what evidence supports the exceptional circumstances to promote Green Belt release in this location;

- Q1 What, if any, weight has been given to the potential for intermodal (ship-to-road) transport in this location, and if so, what consideration been given to how intermodal use can be secured?
- Q2 Is Warrington in possession of evidence supporting the need for a port development in this location, including any assessment of alternative (non-Green Belt) sites such as the currently unused facilities in Runcorn?

#### d. <u>Supporting Evidence – Highways and Access</u>

Warrington has chosen to consult on both the Preferred Development Options and the Warrington Western Link (road proposal) in advance of completing work on its new Transport Model. The lack of this information, and resultant testing of options, limits respondent's ability to assess potential impacts of the proposals and identify potential issues. Particular questions remain concerning the scale and nature of the proposed development and potential access measures;

- Q3 **Scale**; Floorspace / Jobs?
- Q4 Access: Weekly ship movements / direct rail access?
- Q5 **Traffic**; HGV / car movements?
- Q6 **Access**; The latest Western Link plan shows a single new road access from the north?
- Q7 Access; Moore Lane Swing Bridge;
  - retain or remove the existing vehicular access?
  - retain or remove the existing pedestrian/cycle access?
- Q8 Any assessments on the potential impacts (e.g. rat-running / parking) on Moore?
- Q9 When does Warrington envisage being in a position to share assessments of the potential impact of the Preferred Development Options proposals on the wider road network, particularly;
  - Runcorn Road, Moore
  - Moore Lane
  - A56 and A558
  - Junction 11, M56

#### e. Impact on Residential Amenity (Moore / Promenade Park)

The Port Warrington proposal extends along the north bank of the Ship Canal past the existing residential area of Promenade Park located on the south bank within Halton Borough. Halton has significant concerns regarding impacts on residential amenity in this location;

- Q10 Have assessments of potential impacts on residential amenity and any mitigation measures been undertaken? In particular;
  - Is 24 hour operation envisaged?
  - What materials does Warrington envisage the port handling, i.e. containerised traffic, bulk materials (e.g. salt, cement, waste)?
  - What sort of materials handling equipment does Warrington envisage being utilised at the port?
  - O What levels of nuisance (i.e. noise, dust, light) are envisaged?

O What controls, if any, are envisaged on the open storage of materials?

#### f. Loss of valuable recreational resource

The potential loss of Moore Nature Reserve is a concern and additional information would be welcomed on;

- Q11 Assessment(s) of current recreational use of this site?
- Q12 Assessment(s) of potential displacement of current usage to more sensitive locations, e.g. Mersey shoreline and resultant negative impacts on the RAMSAR / Special Protection Area?
- Q13 Assessment(s) of impact on Protected Species?

## 2. South West Urban Extension (SWUE)

Halton objects to the proposed South West Urban Extension (SWUE) as currently drafted. Halton wishes to investigate options for retaining a satisfactory Green Belt gap (physical and perceived) between the towns of Runcorn and Warrington.

#### a) <u>Supporting Evidence – Green Belt Merging of Settlements:</u>

The development would result in the physical and perceived merging of Warrington and Runcorn contrary to national Green Belt policy.

For GA14 (SWUE) Warrington's Green Belt Study concludes;

"Moderate contribution: The GA forms a largely essential gap between the Warrington urban area and Runcorn in the adjacent neighbouring authority of Halton, whereby a reduction in the gap would significantly reduce the actual distance between the towns but would not result in them merging. Overall the GA makes a moderate contribution to preventing towns from merging.

Halton disagrees with this conclusion, the presence of Moore Village and the ribbon development linking into Runcorn is ignored. Current proposals therefore fail to address issues of 'perceived' gap leading to the creation of an unbroken line of development between Runcorn and Warrington.

#### b) Supporting Evidence – Highways and Access

- Q14 The potential impact of the Preferred Development Options proposals on the wider road network needs scrutiny particularly;
  - o Runcorn Road, Moore
  - Moore Lane
  - o A56 and A558
  - o Junction 11, M56

When will supporting studies be available?

#### c) Bridgewater Canal Marina

Peel Holdings have previously identified a need for additional marina facilities on the Bridgewater Canal in this general area. Consideration therefore should be given to the inclusion of a canal marina as part of the SWUE.

## 3. Supporting Evidence

Halton wishes to understand better elements of Warrington's evidence base that justify its current 'preferred development option'.

#### a) Green Belt Study

Concerns have been raised with the Green Belt Study methodology and remain unresolved:

#### Comprehensiveness

Warrington's Green Belt Study has been undertaken in three parts

- o 'General Areas' Borough divided into 'General Areas' with assessments undertaken.
- o 'Parcels', Where General Areas assessed as performed 'weak' or 'moderate' Green Belt function, smaller parcels identified and assessed
- o Call for Sites Third stage was undertaken assessing Call for Sites submission sites.

Halton is concerned that this does not represent a comprehensive approach. The chosen 'selective' approach limits respondent's ability to understand Warrington's choices and to compare the Green Belt function of the proposed releases with areas to be retained. For example an individual assessment for the <u>specific area</u> of Green Belt proposed to be released through the Warrington Waterfront proposal is required.

#### Parcel WR65.

This very large parcel is transected by a watercourse (a potential strong green belt boundary) running north south through the middle of the site which would suggest this site should have been dealt with as two separate parcels.

• Green Belt Purpose 1: To check the unrestricted sprawl of large built up areas. The assessment for Purpose 1 only considers the development of sites contributing to outward sprawl from Warrington. The 'Justification for the [overall] assessment' (summary) for individual parcels effectively 'marks down' the contribution of parcels not adjoining Warrington Town where Purpose 1 is scored as 'no contribution'. This will skew the results for sites adjoining Runcorn and Moore (and other settlements) undermining the validity of the study.

The assessments against Purpose 1 appear inconsistent in places with some assessments discussing the strengths of boundaries that do not form an existing green belt edge. The assessments for GA14 (Moderate) and R18/125-SWUE (Weak) are a case in point.

- Green Belt Purpose 2: Prevent neighbouring towns merging into one another The Green Belt Study's assessment of 'remaining gap' appears to simply consider the remaining width of the currently adopted Green Belt. This disregards the presence of existing built development (i.e. Moore Village), and the effects on the remaining 'perceived gap' on the ground.
- Green Belt Purpose 4: To preserve the setting and special character of historic towns

A further understanding of the assessments under Purpose 4, particularly the identification of 'historic towns' and the measure of 'views of the Parish Church' is welcomed.

The Study attributes special significance to two Conservation Areas, Warrington Town Centre and Lymm. Discussion would be welcomed on;

- Q15 the special significance of Warrington Town Centre and Lymm Conservation Areas on Green Belt function
- Q16 the impact on the overall assessment, of discounting the presence of Conservation Areas elsewhere in Warrington and neighbouring authorities e.g. Walton Village and Moore Village.

#### Minor Correction

Para 145, the final Green Belt Study report (Oct16) states that "minor amendments were made to the methodology to account for comments from neighbouring authorities", and Para 80 reads "Prior to being finalised, the parcels and the boundaries used were reviewed with neighbouring authorities and agreed under Duty to Co-operate arrangements". Halton did not see Parcel boundaries until publication of the final report (Oct16).

#### b) Development Needs

Halton and St.Helens, as authorities within the same defined strategic Housing Market Area (HMA), have previously aligned our assessments of housing need (Strategic Housing Market Assessment) with Warrington. As such Halton officers have a good understanding of the work behind the housing figures.

There has been less close working on employment needs. Normally, Halton as a neighbouring authority would not consider this to be a strategic cross-boundary issue. However, in this instance, as Warrington's New City ambitions appear to be a significant component affecting the level of Green Belt release proposed, and given Warrington's preferred locations for this Green Belt release (e.g. Port Warrington), Halton would appreciate additional discussions concerning:

- Q17 Background to the proposed employment land figures
- Q18 Details of any sectoral priorities, with particular regard to the Port Warrington proposal

#### c) Land Supply (SHLAA)

Halton and St.Helens, as authorities within the same defined strategic Housing Market Area (HMA) have previously aligned our assessments of housing land supply (SHLAA) with Warrington, allowing the collation and assessment of figures across the HMA. Unfortunately, this close alignment to be maintained. Halton would welcome the opportunity to fully understand any divergence of approach and the potential impact on strategic planning across the HMA.

#### 4. Retail

It is understood that additional work has yet to be undertaken to fully quantify the level of additional retail floorspace that Warrington will plan for. This work will account for the elevated housing and hence population numbers, being promoted. This is of

interest to Halton has as Warrington draws significant expenditure from within Halton Borough.

Whilst competition between town centres is not usually a planning matter, impact on Halton Town Centres from out-of-centre developments may be a concern. Halton therefore looks forward to the completion of Warrington's additional retail calculations and details of locational preferences. Halton would appreciate information and early engagement concerning impact on Halton's town centres of any substantial out-of-centre proposals.