



Local Plans
Warrington Borough Council
New Town House
WARRINGTON
WA1 1UH



Dear Local Plans Team,

Warrington Local Plan – Preferred Development Option (Reg 18) Consultation.

Please find below Halton Borough Council's representations concerning your Preferred Development Options (July 2017) consultation.

Halton has concerns regarding;

1. Employment Land needs
2. Land Supply (SHLAA)
3. Green Belt Assessment
4. Duty to Co-operate
5. Warrington Waterfront
6. Warrington South West Urban Extension
7. Gypsy and Travellers provision
8. Retail
9. Affordable Housing

1. Employment Land needs

- 1.1. Halton has concerns regarding the level of employment growth that Warrington is planning for, in so far as it impacts on the Green Belt between Warrington and Widnes/Runcorn.
- 1.2. Warrington appears to be planning for 31,000 jobs in the period 2015~40. This figure is drawn from the Cheshire and Warrington LEP Strategic Economic Plan. This figure appears to be about 33% higher than the average of the 'baseline' economic forecasts commissioned by Warrington.
- 1.3. Halton note that Warrington has recently allowed significant areas of employment land to be lost to residential development (1,100 dwellings on Omega, Gemini 8) and appears to be promoting the loss of further 'city centre' sites to residential use (e.g. Palatine Industrial Estate / southern Centre Park etc). Warrington appears to have insufficient, readily developable land for employment purposes and is resorting to extending Omega into the neighbouring authority of St.Helens and proposing to place a third of its total 'need' in the Warrington Waterfront area, removing the Green Belt gap to Runcorn.
- 1.4. Halton looks forward to working with Warrington colleagues to better understand the justification for this scale of development, why they feel Warrington's growth ambitions warrant the merging of Warrington and Runcorn and why alternative, less sensitive Green Belt areas (such as Barleycastle

Trading Estate south of the M56) have not been chosen in preference to merging Warrington with Runcorn.

2. Land Supply (SHLAA)

- 2.1. Halton is concerned that by substituting figures from the Urban Capacity Statement (Oct16) with figures from a Warrington and Co. Town Centre Masterplan, Warrington may be at risk of overstating the deliverable and developable supply of urban land.
- 2.2. Halton would like reassurance concerning the suitability and deliverability of these substitutions as any shortfall in the stated supply will likely need to be made up from sites within the existing Green Belt, notably;
 - a) Riverside Retail Park / Wharf Street Industrial Area
 - b) Palatine Industrial Estate
 - c) Warrington Central Trading Estate (Bewsey Road/Dallam Lane)

3. Green Belt Assessment

Correction

- 3.1. 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 supplied comments and raised concerns about aspects of the than proposed Green Belt Study methodology. We have not had any contact with the consultants, nor have we seen any material to say how our, or others’, comments were addressed or why they were discounted. Halton did not see Parcel boundaries until publication of the final report (Oct16).
- 3.2. Halton continues to have significant concerns regarding aspects of the Green Belt Study.

Comprehensiveness

- 3.3. Warrington’s Green Belt Study has been undertaken in three parts
 - (1) ‘General Areas’ Borough divided into ‘General Areas’ with assessments undertaken.
 - (2) ‘Parcels’, Where General Areas assessed as performed ‘weak’ or ‘moderate’ Green Belt function, smaller parcels identified and assessed
 - (3) Call for Sites - Third stage was undertaken assessing Call for Sites submission sites.
- 3.4. Halton is concerned that this is not a comprehensive approach, with ‘Parcels’ (Stage 2) covering only a *selected* fraction of the General Areas identified as *weak* or *moderate* (Stage 1). Halton can see no justification for this selective approach which fundamentally reduces the usefulness of the study. For instance, with regard to the SWUE proposal, it is limits the ability to compare how this area (closing the green belt gap between Warrington and Runcorn) compares with sites between, for example, Omega North and Burtonwood, or between Culcheth and Croft.
- 3.5. In addition, despite the Green Belt Assessment Addendum being dated June 2017 and the Green Belt Extra Assessments report being dated July 2017, Warrington appears to have not provided an individual assessment for the specific area of Green Belt proposed to be released through the Warrington Waterfront proposal.

Parcel WR65.

- 3.6. 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.

- 3.7. Halton maintains its objection (as stated to the proposed methodology) that the assessment for Green Belt *Purpose 1* only considers the development of sites contributing to outward sprawl from Warrington i.e. sites adjoining Warrington town. Given Warrington's location between major conurbations and the existence of built development up to neighbouring authority's boundaries in places, this is an artificial and unjustifiable restriction that undermines the validity of the study. This has potentially skewed the results for sites adjoining Runcorn and Moore.
- 3.8. The '*Justification for the [overall] assessment*' for the individual parcels effectively marks down the contribution to the green belt, of parcels not adjoining Warrington Town where Purpose 1 is scored as 'no contribution'. This has skewed the results for sites adjoining Runcorn and Moore, and undermines the validity of the study.
- 3.9. Halton considers that the assessments against Purpose 1 appear inconsistent in places with some assessments apparently 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

- 3.10. Halton has concerns regarding the Green Belt Study's assessment of remaining gap. It appears in places that the Study has looked simply at the remaining width of the, as currently adopted, Green Belt and disregarded the presence of existing built development (i.e. Moore Village) and the effects of the remaining 'perceived gap' on the ground.

Green Belt Purpose 4: To preserve the setting and special character of historic towns

- 3.11. As stated in our comments about the proposed methodology, Halton question the premise of the assessments under Purpose 4, particularly the identification of 'historic towns' and curious measure of 'views of the Parish Church'.
- 3.12. Halton notes that the assessment chooses only to consider two Conservation Areas to be of significance, Warrington Town Centre and Lymm. Indeed, the Green Belt Study Addendum in relation to parcel WR65 (the SWUE) clarified the issue stating "*Purpose 4 refers to the Walton Village Conservation Area in error. Only Warrington Town Centre and Lymm Conservation Areas are deemed to be relevant to the assessment. Purpose 4 should have been assessed as no contribution*" If conservation areas are considered relevant to the assessment of Green Belt function, Halton do not see the special significance of these two Conservation Areas located in the centre of settlements. Halton can see no justification for ignoring the presence of Conservation Areas elsewhere in Warrington and in neighbouring authorities e.g. Moore Village.

4. Duty to Co-operate
Correction

- 4.1. Para 2.37 of the Preferred Development Option document discussing engagement under the duty to co-operate, states that "*No significant issues were raised during these discussions*". This statement is

inaccurate as regards Halton, with officers having expressly stated at the meeting on the 6th April 2017 that Halton would have “*significant concerns regarding any proposals to significantly extend Warrington westwards towards Moore village, not-least as this would impact on Halton’s possible options to address its own development needs*”.

5. Warrington Waterfront - Port Warrington

- 5.1. Halton objects to the proposed Warrington Waterfront proposal as currently drafted and looks forward to working with Warrington to investigate options for retaining a satisfactory gap (both physical and perceived) between the towns of Runcorn and Warrington. Halton’s concerns primarily relate to the Port Warrington element with its resultant removal of the Green Belt between Runcorn and Warrington.

Halton has particular concerns regarding;

- a) Green Belt - Merging of settlements.
- b) Evidence Base - Green Belt Study.
- c) Evidence Base - Highways & Access.
- d) Evidence Base – Need for additional port facilities.
- e) Impact on Halton residents – Promenade Park.
- f) Loss of valuable recreational facility.

a) Green Belt – Merging of settlements

- 5.2. Halton object to the Port Warrington element of the Warrington Waterfront proposal, which results in the merging (physical and perceived) of Runcorn and Warrington contrary to national Green Belt policy.
- 5.3. Halton note that despite the Green Belt Assessment Addendum being dated June 2017 and the Green Belt Extra Assessments report being dated July 2017, Warrington appears not to have provided an individual assessment for the specific area of Green Belt proposed to be released through the Warrington Waterfront proposal. However it is clear that for (Green Belt) Purpose 2 the assessment would be the same as for General Area 15 - GA15, namely.

*“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.**”*

- 5.4. The Green Belt Assessment Final Report (Oct2016) reviews how a number of other Green Belt Studies have fared at examination, including the following conclusions from the Inspector examining Cheshire East’s Plan [our emphasis];

50. The Inspector identified several flaws in the overall approach to the Green Belt Assessment, including:

*There were several cases where the Green Belt assessment does not support the release of specific sites from the Green Belt **and the review appears to have given greater weight to other factors, such as land ownership, availability and deliverability** when preparing and finalising the Plan.*

Halton would suggest that there are clear similarities in Warrington's approach with regard to (Peel's) Port Warrington and South West Urban Extensions sites, particularly sites WR68, WR69, WR70 and WR71 that Warrington's Green Belt study concludes perform a strong green belt function, but are proposed for development.

b) Evidence Base –Green Belt Study

- 5.5. As noted above, Warrington appears not to have provided an individual Green Belt assessment for the area proposed to be released for Warrington Waterfront. General Area 15 [GA15] covering Port Warrington, was assessed as having moderate Green Belt function. The Oct16 iteration of the Green Belt work divided General Area 15 (Port Warrington) into six Parcels, and concluded individually 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.

Green Belt Purpose 1

- 5.6. Halton maintains its objection (as stated to the proposed methodology) that the assessment for *Purpose 1: Check unrestricted sprawl* only considers development of sites contributing to outward sprawl from Warrington i.e. sites adjoining Warrington town. Given Warrington's location between major conurbations and the existence of built development up to neighbouring authority's boundaries in places, this is an artificial and unjustifiable restriction.
- 5.7. The '*Justification for the [overall] assessment*' for the individual parcels effectively marks down the contribution to the green belt of parcels not adjoining Warrington where Purpose 1 is scored as 'no contribution'. This has skewed the results for sites adjoining Runcorn and Moore, and undermines the validity of the study.
- 5.8. Halton considers that the assessments against Purpose 1 appear inconsistent in places with some assessments apparently focussing on the strength 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.

c) Evidence Base –Highways and Access

- 5.9. 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 local Transport Model. Whilst Halton has sympathies regarding the need to progress with both projects, the lack of this information and resultant testing of options limits respondents ability to assess potential impacts of the proposals and identify potential problems.
- 5.10. This is particularly the case with the Warrington Waterfront and Port Warrington proposals, where there is no substantive information provided as to how the latter may be accessed.
- 5.11. The Port Warrington proposal extends to some 75Ha, with an additional 25 ha. elsewhere in the wider waterfront area equating to 34% of Warrington's proposed employment land allocations. Warrington is planning for 31,000 additional jobs over the plan period suggesting that up to 10,500 persons may commute into the waterfront area with up to 7,750 being employed at Port Warrington (pro-rata).
- 5.12. Warrington's latest Western Link consultation shows provision for only a single junction to serve Port Warrington on the proposed Western Link road, providing a single point of access from the north.

Halton has serious concerns about the accessibility of the Port Warrington proposal and potential impacts on Moore / Promenade Park;

- How much floorspace is proposed at Port Warrington – 2 million SqFt?
- How many jobs are proposed at Port Warrington?
- How many vessel dockings does Warrington envisage at the port – we note that Peel’s new container vessel has a capacity of 260 TEUs, suggesting 260 HGV movements per docking.
- What level of HGV/staff traffic does Warrington envisage from Port Warrington?
- Is the intention to have only one new access from the north?
- Is one access sufficient for the level of development proposed?
- Is the intention to retain or remove the existing vehicular / pedestrian access across Moore Lane swing-bridge, and what potential impacts has Warrington identified on Moore Village for each option; e.g. rat running, employee parking etc.?
- How will delivery of the northern access road to the Western Link be secured?

5.13. As with our comments to the Western Link consultation, Halton have concerns regarding potential traffic impacts on;

- Runcorn Road, Moore
- Moore Lane
- A56 and A558
- Junction 11, M56
- Mersey Gateway

We look forward to Warrington completing the technical transport work and sharing the results so we have quantitative data to identify any potential problems.

d) Evidence Base – Need for additional port facilities

5.14. Halton has not seen any evidence supporting the need for the port development in this location, especially as there are unused port facilities within Runcorn at Weston Docks, and given previous proposals from the Manchester Ship Canal Company were to rationalise port facilities along the Ship Canal.

- What assessment of alternative (non-Green Belt) sites has Warrington undertaken to show the need for a port in this location is justified?
- What assessment of existing and future port capacity has Warrington undertaken to show exceptional circumstances for Green Belt release for this development?
- What steps has Warrington identified to ensure that any development at Port Warrington is truly multi-modal (ship-to-road), and not just general employment?

e) Impact on Moore / Promenade Park

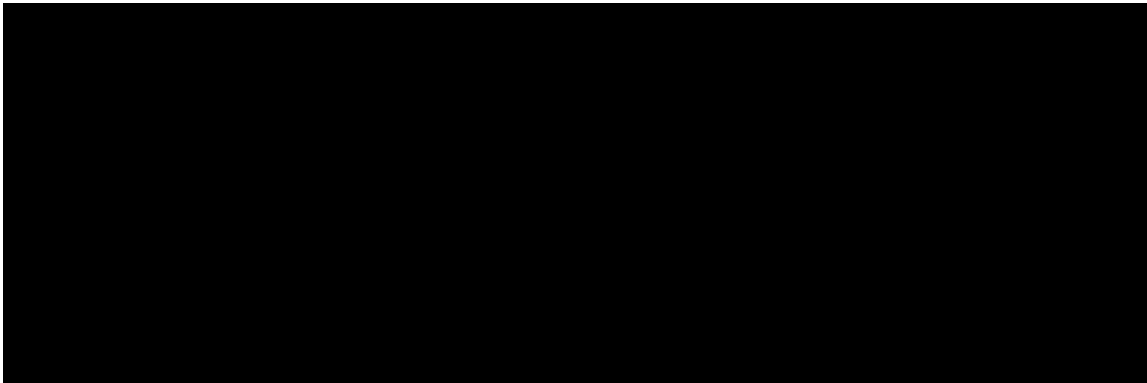
5.15. The Port Warrington proposal extends along the north bank of the Ship Canal past the existing residential area of Promenade Park on the south bank within Halton Borough. As the port will obviously have to front directly onto the Ship Canal, there would appear to be negligible opportunity to provide screening of the commercial uses from the residential.

5.16. Halton has a number of concerns regarding the residential amenity of existing residents and would request additional information on;

- Does Warrington envisage 24 hour operation of the port facilities?

- What materials does Warrington envisage the port handling, i.e. containerised traffic, bulk materials (e.g. salt, cement, waste)?
- What sort of goods handling equipment does Warrington envisage being utilised at the port and what nuisance levels does it consider acceptable (i.e. noise, dust, light)?
- What controls will be enforced on open storage of materials?
- What, if any, consideration has been given to the amenity of the existing residential area?

Halton notes that the existing operations in this location utilise a lot of open storage, including the open storage of baled waste.



f) Loss of valuable recreational resource

- 5.17. Halton was surprised that Warrington's Port Warrington proposal involves the substantial removal of Moore Nature Reserve.
- 5.18. Halton has the following concerns and would request additional information on;
- What assessment(s) has Warrington undertaken on current recreational use of this site?
 - What assessment(s) has Warrington undertaken on potential displacement of current recreational visits to Moore to more sensitive locations, e.g. Mersey shoreline and resultant negative impacts on the RAMSAR / Special Protection Area?
 - What assessment(s) has Warrington undertaken on impact on Protected Species?

6. South West Urban Extension (SWUE)

- 6.1. Halton wishes to object to the proposed South West Urban Extension (SWUE) as currently proposed and looks forward to working with Warrington to investigate options for retaining a satisfactory Green Belt gap (physical and perceived) between the towns of Runcorn and Warrington.

Halton's wishes to raise concerns regarding;

- (4) Green Belt - Merging of settlements
- (5) Evidence Base - Green Belt Study
- (6) Evidence Base - Highways & Access
- (7) Bridgewater Canal Marina

a) Green Belt – Merging of settlements

- 6.2. 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.*

- 6.3. Halton disagrees with this assessment / conclusion. It seems clear Warrington’s consultants have had regard to the remaining distance of the *adopted* Green Belt to Runcorn, apparently ignoring the presence of Moore Village and the ribbon development creating a near unbroken line of development from Sandymoor, through Moore, Warrington’s South West Urban Extension, to Walton, Stockton Heath and Grappenhall. Warrington’s proposal as drafted would essentially lead to constant development along the Ship Canal from the Weaver Navigation to the Thelwall Ferry.
- 6.4. These conclusions / outcome are regardless of any proposals Halton may produce for land around Moore village in its own emerging Local Plan.

b) Evidence Base –Green Belt Study
Parcel WR65.

- 6.5. 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.

c) Evidence Base –Highways and Access

- 6.6. 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 local Transport Model. Whilst Halton has sympathies regarding the need to progress with both projects, the lack of this information and resultant testing of options limits respondents ability to assess potential impacts of the proposals and identify potential problems.
- 6.7. As with our comments to the Western Link consultation, Halton have concerns regarding potential traffic impacts on;
- Runcorn Road, Moore
 - Moore Lane
 - A56 and A558
 - Junction 11, M56
 - Mersey Gateway

We look forward to Warrington completing the technical transport work and sharing the results.

d) Bridgewater Canal Marina

- 6.8. Peel Holdings have previously identified a need for additional marina facilities on the Bridgewater Canal in the wider Runcorn area. Previously Halton had identified a broad location within the Daresbury Strategic Site (Policy CS11: East Runcorn), but this site appears to have unresolved technical deficiencies.
- 6.9. As Peel are the promoter of Warrington’s SWUE (Call for Sites – Dec16) Halton is surprised at the omission of a marina from the SWUE proposals and therefore request that consideration be given to the inclusion of a canal marina as part of the SWUE (as amended).

7. Gypsies & Travellers

7.1. The location of provision for Gypsies and Travellers in Warrington is largely not a concern for Halton, however Halton is somewhat concerned that Warrington's initial approach is to simply allocate three existing unauthorised sites within the current Green Belt as this approach provides encouragement for the establishment of further such unauthorised green belt encampments in neighbouring authorities.

8. Retail

8.1. Warrington officers have indicated that additional work will 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.

8.2. Halton note, that despite identifying additional (net) retail requirement, it is unclear where Warrington intends to accommodate this need, with the City Centre Masterplan (Figure 4) apparently proposing the redevelopment of a number of existing retail sites;

Existing Retail Location	City Centre Masterplan
Riverside Retail Park	Residential Development
DFS (Mersey Street)	Mixed Use Development
Iceland (Crossfield Street)	Bank Quay station parking
Dunelm Mill (Parker Street)	Bank Quay station parking
Go Outdoors (Wilson Patten Street)	Mixed Use Development
Sainsbury's (Church Street)	(Site divided) Mixed Use Development
Cockhedge Centre	(Site divided) Mixed Use Development
Pinner's Brow Retail Park	Mixed Use Development

8.3. Halton has concerns about the potential scale of Warrington's 'city centre' ambitions as previous retail studies have identified that Warrington Town Centre draws significant expenditure from within Halton. Halton therefore reserves its position pending the outcomes of further research and clarification from Warrington concerning the scale and location of future retail provision.

9. Affordable Housing

9.1. Whilst unlikely to be a cross-boundary issue affecting Halton, officers are surprised that Warrington has not included any mention of affordable housing, especially at this was the element of the previous Plan that was quashed by the High Court, precipitating the current Plan.

10. Conclusion

10.1. Halton looks forward to working with colleagues in Warrington going forward to address the above issues.

Yours sincerely

[Redacted signature]