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By post and email to:
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Our Ref: SA27860/HH
Date: 14th June 2019

Dear Michael,

REPRESENTATIONS ON THE SUBMISSION WARRINGTON LOCAL PLAN ON BEHALF OF MOORE PARISH COUNCIL

This representation is on behalf of Moore Parish Council. It is accompanied by duly made representations forms on each of the following parts of the Submission Local Plan:

- Policy GB1 Green Belt
- Policy MD1 Warrington Waterfront
- Policy MD3 The SW Urban Extension
- Policy DEV1 Housing Delivery
- Policy DC3 Green Infrastructure Network

For the reasons detailed on the attached submissions, Moore Parish Council contends that the Submission Local Plan is not currently 'sound', failing to meet the tests of 'justified', 'effective' and 'consistent with national policy'. We have suggested a number of changes that would make the Local Plan more acceptable.

I trust you will consider the Parish Council's comments carefully. We hope to work positively with Warrington Borough Council during the course of the Local Plan's examination to achieve a sound, modified Plan.

Yours sincerely,

Helen Howie MA(Hons) MCD MRTPI
For and on behalf of Berrys

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Encl. Local Plan Representation
Appendix: Peel Ports Strategy



Chartered Surveyors and Valuers | Property and Business Consultants | Chartered Town Planners



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WARRINGTON
Borough Council

Proposed Submission Version Local Plan Representation Form

Introduction

This representation is on behalf of Moore Parish Council. It is accompanied by duly made representations forms on each of the following Policies:

Policy GB1 Green Belt
Policy MD1 Warrington Waterfront
Policy MD3 The SW Urban Extension
Policy DEV1 Housing Delivery
Policy DC3 Green Infrastructure Network

For the reasons detailed on the attached submissions, Moore Parish Council contends that the Submission Local Plan is not currently 'sound', failing to meet the tests of 'justified', 'effective' and 'consistent with national policy'. We have suggested a number of changes that would make the Local Plan more acceptable and hope to work positively with Warrington Borough Council during the course of the Local Plan's examination to achieve a sound, modified Plan.

Moore Parish Council wish to participate in the examination hearings for the reasons set out in Part 7 at the end of this document.

PART A – Representor

Moore Parish Council

c/o Parish Clerk Catherine Fitch

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PART B - Representation Form

1. To which part (chapter/policy) of the Local Plan does this representation relate?

Policy GB1 Green Belt

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)?

Policy sub-numbers:

3 Land removed from the Green Belt in relation to:

- a) Warrington Waterfront
- c) South West Urban Extension

paragraphs 5.1.12 and 5.1.13 in relation to the Green Belt Assessment

Policies Map in relation to the Green Belt gap between Warrington and Moore

3. Do you consider the Draft Local Plan is: Please 'x' one option in each row.

	Yes	No
Legally Compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Policy GB1 is unsound because it is:

- Not Justified as an appropriate strategy
- Not consistent with national policy

We question whether the Plan is compliant with the Duty to Cooperate

These reasons are elaborated below.

The proposals in Policy GB1 are not justified as they run counter to the Plan's objectives and to the fundamental purposes of the Green Belt.

The Plan's strategy is to achieve its objectives, including "*Objective W2: To ensure Warrington's revised Green Belt boundaries maintain the permanence of the Green*

Belt in the long term.” Objective W2 echoes paragraph 136 of the National Planning Policy Framework (NPPF) which states that any changes to Green Belt boundaries must have, *“regard to their intended permanence in the long term.”*

Permanence does not mean no change, but it does mean preservation of the purposes of the Green Belt over the long term. While there can be some tweaks to Green Belt boundaries, it is necessary to ensure that any changes do not undermine the purposes of the Green Belt and thereby undermine the permanence of the designation as a whole.

The NPPF paragraphs 134 and 135 state:

“134. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

135. The Green Belt serves five purposes:

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

Purpose (b) is of particular relevance around Moore, where Warrington comes close to Runcorn. The proposed Port Warrington and SW urban extension will erode the gap between the two towns as shown in figures 1 and 2 below.

Figure 1.extract from the Warrington Policies Map

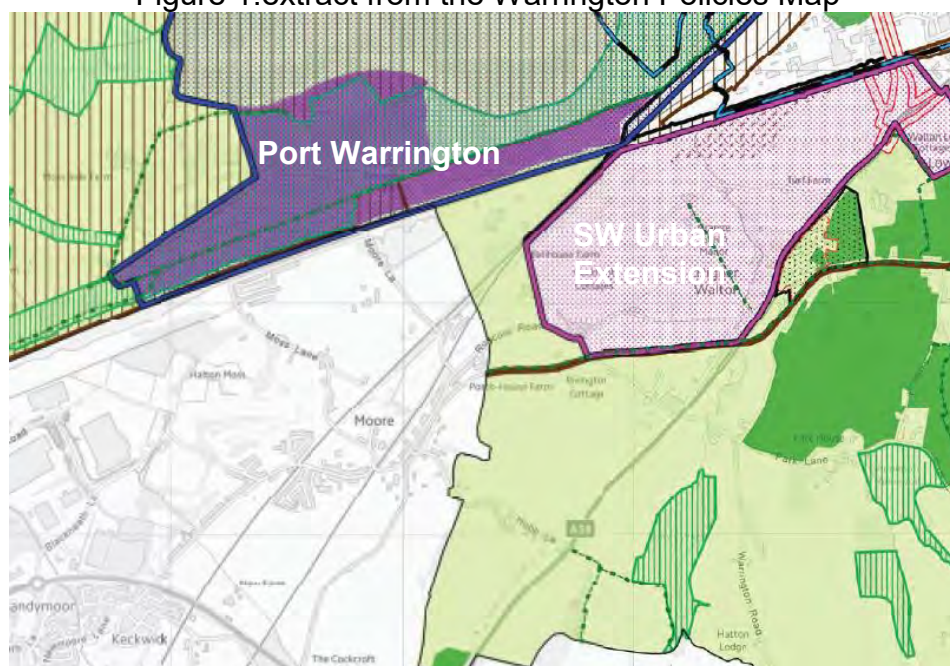
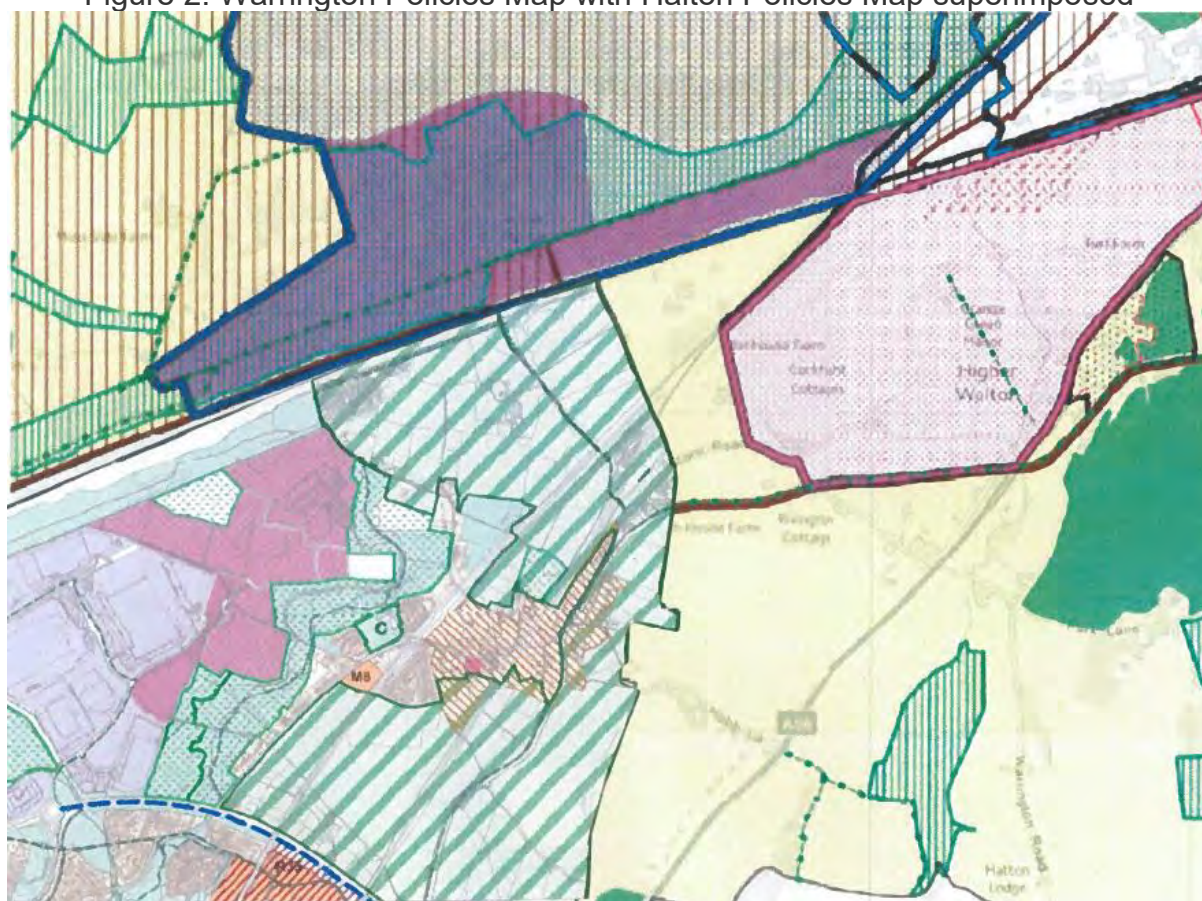


Figure 2 shows the Halton Submission Local Plan superimposed on the WBC Submission Local Plan. The Green Belt is shown in yellow-green on the WBC Plan and in dark green diagonal stripes on the HBC Plan.

The proposed Port Warrington employment allocation north of the Ship Canal is a dark purple shade that appears blue-purple where it overlaps with the Local Wildlife Site green hatching. South of the Ship Canal, Halton Borough Council propose an employment allocation (purple) adjoining an existing primary employment area (lilac). The bank of the Ship Canal is designated as 'greenspace' in light green shading.

The proposed Port Warrington allocation will result in Warrington's employment areas almost touching Halton's employment areas, effectively eliminating any meaningful gap between the two towns. This is contrary to the purpose of the Green Belt in preventing neighbouring towns from merging, to the extent that the Green Belt's role in this regard will be lost in this location.

Figure 2. Warrington Policies Map with Halton Policies Map superimposed



Halton Policies Map key

- Green Belt
- Greenspace
- Employment Allocation
- Primarily Employment

Warrington Policies Map key

- Existing Employment Areas (DEV4)
- Employment Allocations (DEV4)
- Fiddlers Ferry (DEV4)
- District / Neighbourhood Centres (DEV5)
- Local Centres (DEV5)
- Community Hubs (DEV5)
- Warrington's Green Belt (GB1)
- Local Wildlife Sites (DC4)

Under these proposals, a person standing on the banks of the Ship Canal will experience built development on either side of the canal, with buildings at Port Warrington directly opposite buildings at Halton Moss, Runcorn. Green Belt purpose (b) has been eliminated.

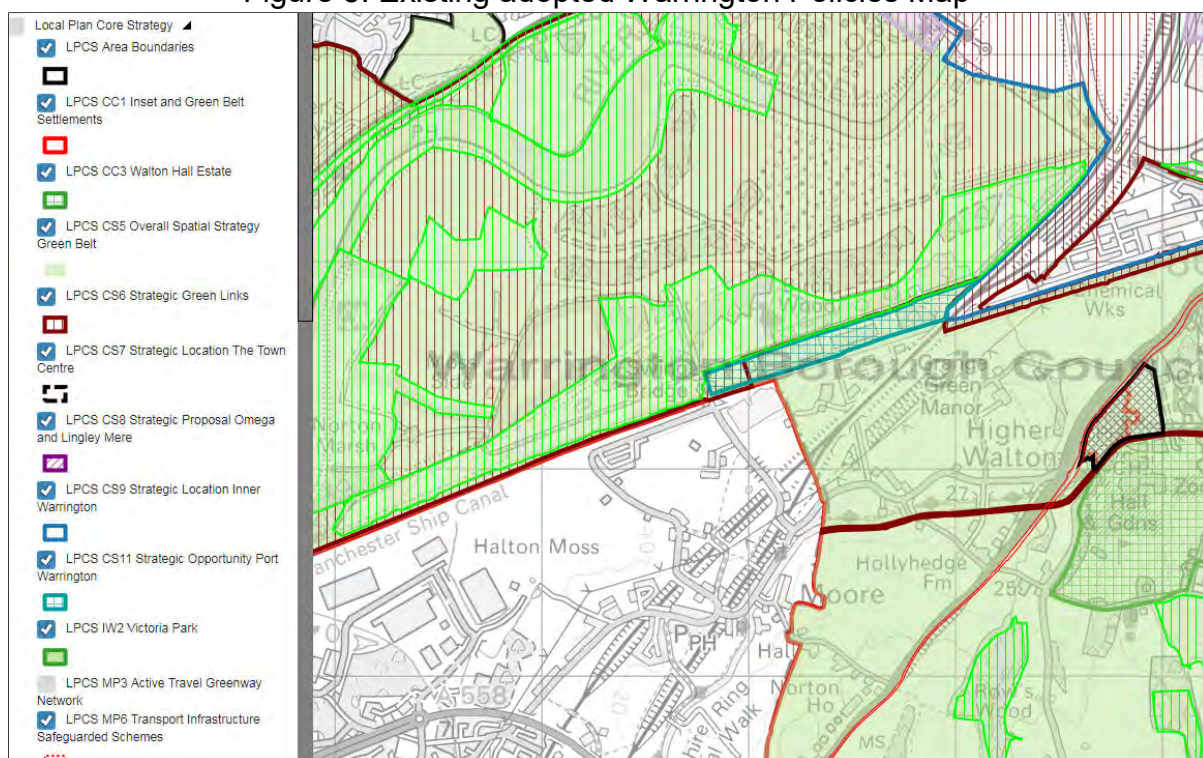
The gap between the suburban area of Warrington and the edge of Runcorn will be significantly reduced by the South West Urban Extension, undermining Green Belt purpose (b) in particular, but also undermining Green Belt purposes (a), (c) and (d). The overall impact completely undermines the permanence of the Green Belt in this location.

This means that Policy GB1 will effectively undermine Local Plan objective W2, to maintain the permanence of the Green Belt in the long term, rendering the plan unjustified (against its objectives) and contrary to national policy.

Green Belt Assessment

For comparison purposes, the existing adopted Warrington Policies Map is reproduced in figure 3 below. Comparing figures 3 and 2 shows the extent to which the Green Belt will be rolled back under Policy GB1.

Figure 3. Existing adopted Warrington Policies Map



The Council's Green Belt Assessment has fundamental shortcomings. The original Arup Study 2016 and the Additional Sites Assessment July 2017 only considered the sprawl of Warrington and ignored the urban sprawl of the wider urban area including Widnes and Runcorn. Sites not adjoining Warrington's urban area were discounted as having little contribution to purpose 1 on this basis.

We agree with the criticism of this approach by Halton Borough Council in their letter of 28th September 2017 (pages 102-110 of Duty to Cooperate Record F: Responses to R18 Consultation). In that letter, Halton Borough Council state,

“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.

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.” (paragraphs 5.7 & 5.8)

A further round of Green Belt Assessment in May 2018 corrected this in relation to the part of the SW extension that adjoins Warrington (revised site R18/P2/115 & R18/P2/031) but failed to make any alteration to R18/P2/125A, R18/P2/125B & R18/P2/125C and I R18/P2/095 which it continues to consider make ‘no contribution’ to purpose 1 of the Green Belt. The location of these sites is shown in figures 4a and 4b overleaf, with the relevant Green Belt assessments reproduced in figures 5a and 5b for ease of reference.

Due to this flawed methodology, Port Warrington (site R18/133) was considered to have only a ‘weak’ contribution while the SW Urban Extension (site R18/P2/125A, R18/P2/125B, R18/P2/125C and R18/P2/095) have been considered to have ‘no contribution’ to Green Belt purpose 1 in the Green Belt Assessment. This cannot be correct.

It is notable that sites R18/P2/095 and R18/P2/125B are considered to make a ‘strong’ overall contribution to the purposes of the Green Belt.

Figure 4a: Sites in the Additional Green Belt Assessments (WBC, July 2017)

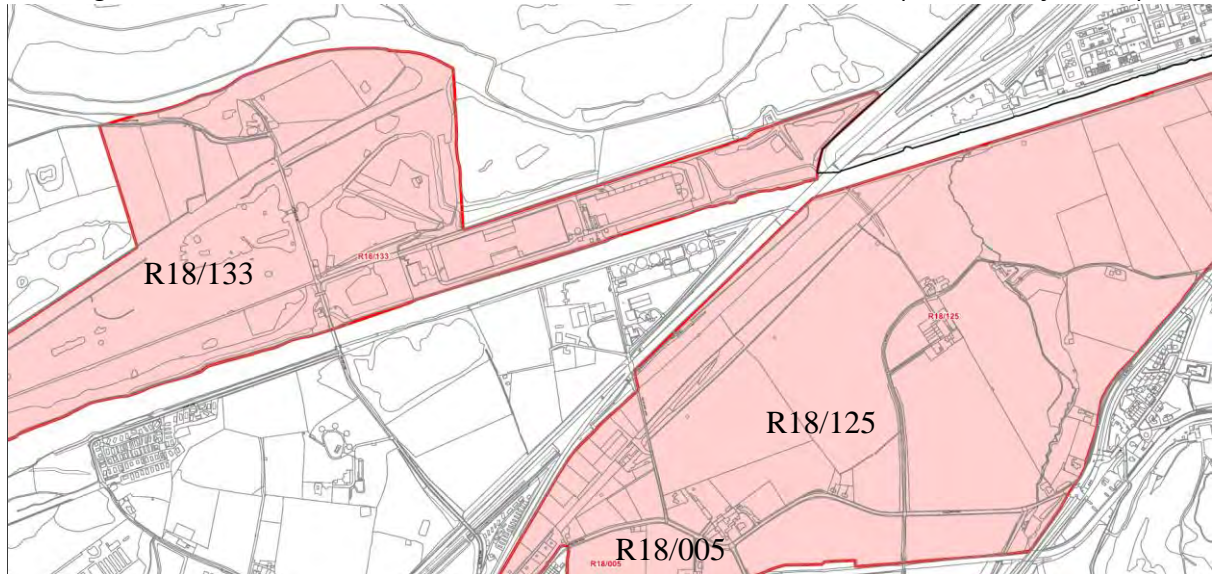


Figure 4b: Revised sites in the Additional Site Assessment (WBC, May 2018)

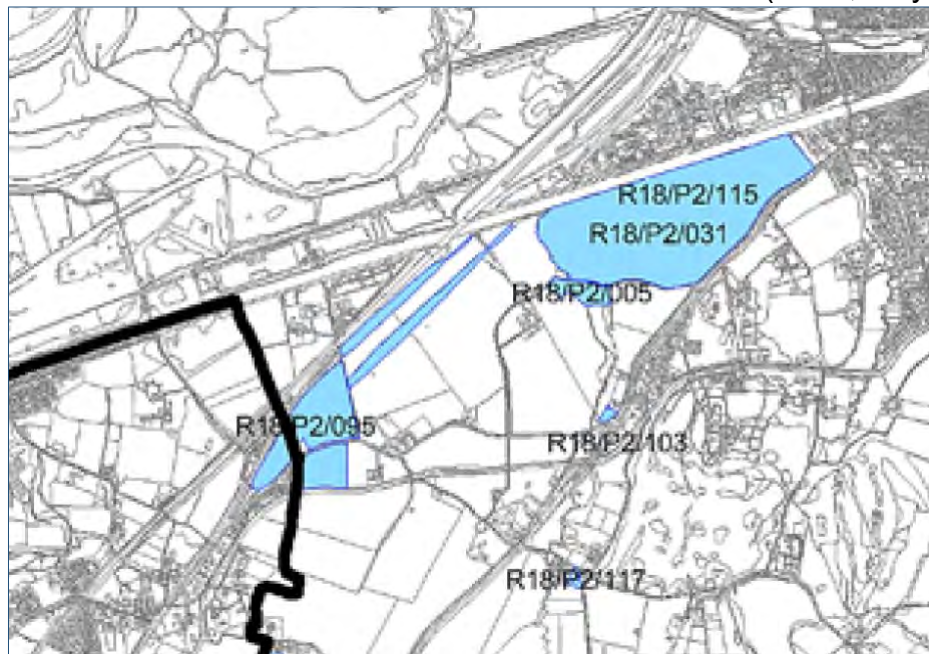


Figure 5a. Extracts from the Green Belt Assessment (Additional Site Assessments of Call for Sites responses and SHLAA Greenbelt Sites) July 2017 pages 109 (R18/005), page 110 (R18/125) and page 106 (R18/133)

Site	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
R18/005 [Site R18/005 is split into two sites, one north of Runcorn Road and one to the south. The majority of the northern site is located within Halton Borough Council and is not within the Warrington administrative area and therefore it has not been assessed.]	No contribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	Weak contribution: The site forms a less essential gap between the Warrington urban area and Runcorn whereby development of the site would reduce the actual gap between the towns however would not result in them merging. Overall, the site makes a weak contribution to preventing towns from merging.	Strong contribution: The site is adjacent to the washed over village of Moore which is in the Green Belt and which falls within Halton Borough Council. The western boundary with Moore consists of the rear gardens of residential properties which is not a durable boundary which could prevent encroachment into the site. The boundaries between the site and the open countryside include Runcorn Road to the north, the Bridgwater Canal to the south and a field boundary to the west, which is the only non-durable boundary. These are a mix of boundaries which are predominately durable that would be able to prevent encroachment beyond the site if it were developed. The site has no built form, low levels of vegetation and open, long line views and therefore supports a strong degree of openness. Overall the site makes a strong contribution to safeguarding the countryside from encroachment due to its non-durable boundary with the washed over village of Moore.	No contribution: Warrington is a historic town however the site is not within 250m of the Warrington Town Centre Conservation Areas. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a strong contribution to one purpose, a moderate contribution to one purpose and no contribution to two purposes. In line with the methodology, professional judgement has been applied and the site has been judged to make a moderate overall contribution. Whilst the site supports a strong degree of openness and there is a non-durable boundary with the washed over village of Moore, it has predominantly durable boundaries the open countryside. The site makes no contribution to preventing sprawl and preserving historic towns. It makes a weak contribution to preventing towns from merging.	Moderate contribution
R18/125	Weak Contribution: The Manchester Ship Canal forms the northern boundary between the site and the built-up area which is a durable boundary that is able to prevent sprawl into the site in the long term. The short eastern boundary with the built up area is formed by hedges and a tree lined garden boundary which is not durable and may not prevent sprawl in the long term. Given the shape of the built-up area, development of the site would not round off the settlement pattern. Overall the site makes a weak contribution to checking unrestricted sprawl.	Moderate contribution: The site forms a largely essential gap between the Warrington urban area and Runcorn whereby development of the site would reduce the actual gap between the towns however would not result in them merging, although it would reduce the perception of the gap. Overall, the site makes a moderate contribution to preventing towns from merging.	Strong contribution: The boundary between the site and the built-up area is predominately durable consisting of the Manchester Ship Canal, apart from the short eastern boundary which is not durable. The boundaries are predominately durable and could prevent encroachment into the site. The boundaries between the site and the countryside include the Bridgewater Canal, railway line and Chester New Road (A56) which are durable boundaries that would be able to prevent encroachment beyond the site if it were developed. The western section of the site extends into Halton Council. The boundary to the west which adjoins Moore which is a washed over village in the Green Belt and is located within Halton Council follows the rear gardens of residential properties which are not durable boundaries and Moore Lane which is a durable boundary. The existing land use is a mix with the site predominately open countryside, but also containing a number of dwellings, farms, a dismantled railway line and roads. The site is well connected to the countryside along three boundaries. The site has less than 10% built form, low levels of vegetation (although there are small, denser pockets of vegetation) and open, long line views and therefore supports a strong degree of openness. Overall the site makes a strong contribution to safeguarding the countryside from encroachment due to the weak eastern and western boundary with the settlements.	No contribution: Warrington is a historic town however the site is not within 250m of the Warrington Town Centre Conservation Areas. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a strong contribution to one purpose, a moderate contribution to two purposes, a weak contribution to one purpose, and no contribution to one. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution. Whilst the site supports a strong degree of openness, it has predominantly durable boundaries with both the site and the settlement and the site and the countryside and therefore development would not threaten the overall openness and permanence of the Green Belt. The site performs moderately in terms of preventing sprawl and encouraging urban regeneration. It makes a weak contribution to preventing towns from merging.	Moderate contribution

Site	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
R18/133	Weak contribution: The site is connected to the built up area along a short eastern boundary, which is formed by the embankment adjacent to the railway line, which has dense vegetation. This is a durable boundary however there is existing sprawl within the site. Overall the site makes a weak contribution to checking unrestricted sprawl.	Moderate contribution: The site forms a largely essential gap between the Warrington urban area and Runcorn whereby development of the site would reduce the actual gap but not the perceived gap between the towns. The Manchester Ship Canal ensures the separation is retained. Overall, the site makes a moderate contribution to preventing towns from merging.	Moderate contribution: The boundary between the site and the built-up area is durable as it is the railway embankment however this is a very short extent of the boundary for the site. The boundaries between the site and the countryside consist of the Manchester Ship Canal to the south and part of the northern boundary is formed by the Runcorn and Latchford Canal. The short western boundary is formed by a track and dense tree line and all of these boundaries with the countryside are considered to be durable and able to prevent encroachment beyond the site if it were developed. However, part of the northern boundary is formed by field boundaries, and although there is dense vegetation, it is not considered that these form durable boundaries that could prevent encroachment beyond the site if it were developed. The existing use of the site is split, there are water bodies and roads within the site, however it is predominately Moore Nature Reserve with some warehouse units in the south east. The site is well connected to the countryside along three of the boundaries. The site has less than 20% built form, and dense vegetation which restricts views, and therefore the site supports a weak degree of openness. Overall the site makes a moderate contribution to safeguarding the countryside from encroachment.	No contribution: Warrington is a historic town however the site is not within 250m of the Warrington Town Centre Conservation Areas. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a moderate contribution to three purposes, a weak contribution to one purpose, and no contribution to one. In line with the methodology, the site has been judged to make a moderate overall contribution. The site supports a weak degree of openness and has durable boundaries between the site and settlement. The site performs moderately in terms of preventing towns from merging and encouraging urban regeneration. It makes a weak contribution to preventing sprawl.	Moderate contribution

Figure 5b. Extracts from the Green Belt Additional Site Assessments May 2018 page 3 (R18/P2/115 & R18/P2/031) and page 6 (R18/P2/095)

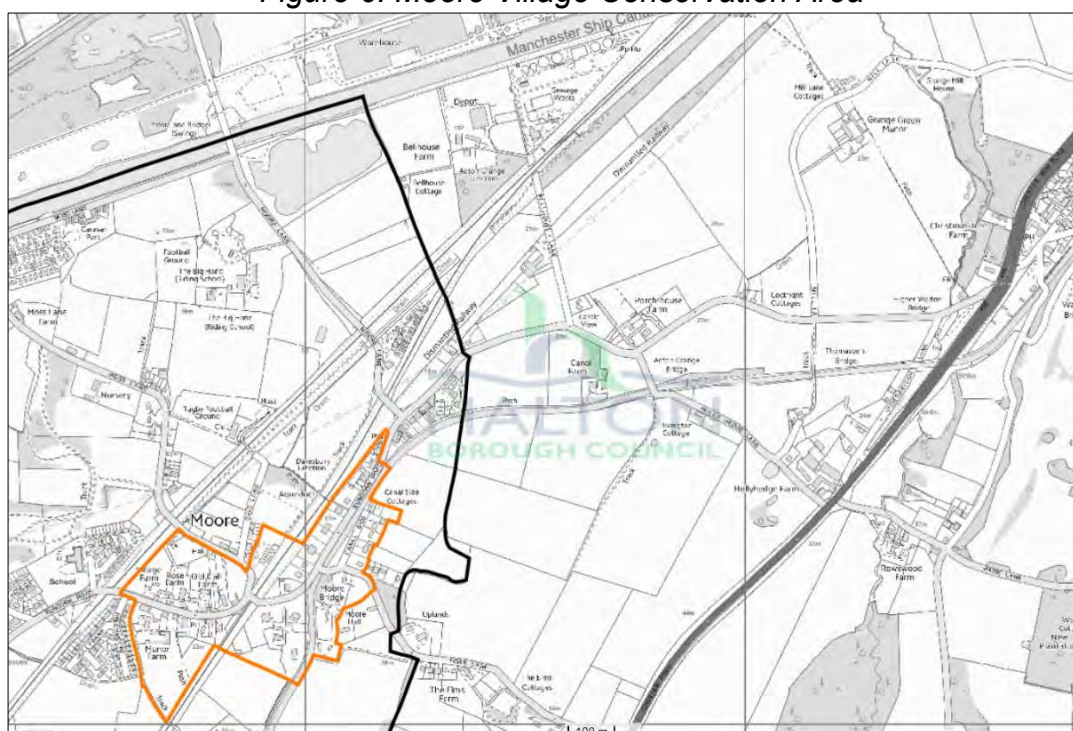
Reference	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
R18/P2/031 R18/P2/115	Moderate contribution: The site is connected to the built up area along its northern boundary and its eastern boundary. Its northern boundary is comprised of the Manchester Ship Canal which is durable and would be able to prevent sprawl. The eastern boundary is comprised of a hedge and tree lined garden boundary which is less durable and may not be able to prevent sprawl. Development of the site would not round off the settlement pattern. Overall the site makes a moderate contribution to checking unrestricted sprawl due to its mix of durable and less durable boundaries.	Weak contribution: The site forms a less essential gap between the Warrington urban area and Runcom whereby development of the site would slightly reduce the actual gap but not the perceived gap between the towns and it would not result in them merging. Overall, the site makes a weak contribution to preventing towns from merging.	Strong contribution: The site is connected to the settlement along its northern and eastern boundaries. The northern boundary is comprised of the Manchester Ship Canal which is durable and would prevent encroachment and the eastern boundary is comprised of a hedge and tree lined garden boundary which is less durable and would not prevent encroachment. The site is connected to the countryside on its southern and western boundaries. The southern boundary is comprised of Chester Road (A56) and Mill Lane which are both durable boundaries which would prevent encroachment if the site were developed. The western boundary is comprised of a tree lined field boundary which is less durable and would not be able to prevent encroachment if the site were developed. The existing land use consists of open in agricultural use. The site does not support long line views and the topography of the site slopes down gradually to the south. There are low levels of vegetation on the site. There is no built form on the site. As such, the site supports a strong- moderate degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment due to some of the boundaries being less durable and its strong- moderate degree of openness.	No contribution: The site is not adjacent to a historic town. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a strong contribution to one purpose, a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to one purpose. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The site had been judged to make a moderate overall contribution to the Green Belt. Whilst the site supports a strong- moderate degree of openness and has some less durable boundaries, its northern and southern boundaries are durable and could contain development preventing it from threatening the overall openness and permanence of the Green Belt.	Moderate contribution
R18/P2/095	No contribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	Weak contribution: The site forms a less essential gap between the Warrington urban area and Runcom whereby development of the site would slightly reduce the actual gap but not the perceived gap between the towns and it would not result in them merging. Overall, the site makes a weak contribution to preventing towns from merging.	Strong contribution: The site is not directly connected to the settlement. The site is well connected to the countryside on all of its boundaries. The northern boundary is comprised of a railway track and the Manchester Ship Canal which are both durable and would be able to prevent encroachment if the site were developed. The western boundary is comprised of the railway line and Moore Lane which are durable and would prevent encroachment. The eastern boundary is comprised of Bellhouse Lane which is durable and would prevent encroachment and the dismantled railway line and field boundary which are both less durable and would not prevent encroachment. The southern boundary is comprised of the Bridgewater Canal and Runcom Road which are both durable and would prevent encroachment. The existing land use consists of open countryside in agricultural use, a dismantled railway in agricultural use and a car garage. There is some spare vegetation across the site. The topography of the site slopes down to the north and north west. There is less than 10% built form on the site. As such, the site supports a strong degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment due to its mix of durable and less durable boundaries with the countryside and its strong degree of openness.	No contribution: The site is not adjacent to a historic town. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to one and no contribution to two. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The site has been judged to make a strong overall contribution as it is completely connected to the countryside, it supports a strong degree of openness and there are some less durable boundaries between the site and the countryside therefore the site has a strong role in preventing encroachment into the open countryside. The site therefore makes a strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt.	Strong contribution

In relation to Purpose 2, to prevent neighbouring towns merging into one another, the Assessment notes for SW Urban Extension parcel R18/125 that development, “*would reduce the perception of the gap*”. Nevertheless, it only rates the parcel as having a ‘moderate’ contribution to purpose 2 rather than a ‘strong’ contribution. This appears a highly biased assessment.

As noted above, Port Warrington site R18/133 is directly opposite Halton’s employment areas and development of Port Warrington will result in the towns’ employment areas adjoining one another across the Ship Canal. The parcel therefore should have a ‘strong’ contribution to Purpose 2, to prevent neighbouring towns from merging and not a ‘moderate’ contribution as in the Green Belt Assessment.

The Green Belt Assessment shows the above parcels to have ‘no contribution’ to Purpose 4, to preserve the setting and special character of historic towns. This assessment completely ignores Moore Village Conservation area, the extent of which is shown in figure 6. Moore Conservation Area includes no fewer than 10 listed buildings. It is wrong to consider that the Green Belt has no role in relation to this historic settlement.

Figure 6: Moore Village Conservation Area



In summary, the Green Belt Assessment is deeply flawed and seriously under-values the contribution made by land between Warrington and Runcorn to the purposes of the Green Belt. Its biased methodology undermines the independence of the Assessment and renders the Plan’s proposals unjustified and contrary to national policy.

Modifications necessary

We suggest that a Green Belt gap is retained between Warrington and Halton by reducing the extent of the Warrington Waterfront Employment Allocation and reducing the extent of the South West Urban Extension.

To make the Plan sound the following changes are necessary, with proposed additions underlined and proposed deletions ~~crossed through~~:

Sub-policy:

Land removed from the Green Belt

3. The following land has been removed from the Green Belt and the amended Green Belt boundaries are shown in Figure 6:

- a. ~~Warrington Waterfront~~
- b. Garden Suburb
- c. ~~South West Urban Extension~~

Amend Figure 6 – Amended Green Belt Boundaries

Amend Policies Map

Please also see our representations on Policies MD1 and MD3.

PART B - Representation Form

1. To which part (chapter/policy) of the Local Plan does this representation relate?

Policy MD1 Warrington Waterfront

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)?

Policy sub-numbers:
 2. removal of employment sites from the Green Belt
 4-11. Delivery and Phasing
 17-36. Detailed Site-specific requirements
 55. Amenity of residents in Promenade Park

Paragraphs 10.1.22 and 10.1.26

3. Do you consider the Draft Local Plan is: Please 'x' one option in each row.

	Yes	No
Legally Complaint	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Policy MD1 is unsound because it is:

- i.) Not Justified as an appropriate strategy;
- ii.) Not consistent with national policy protections for designated wildlife sites;
- iii.) Not consistent with national policy in relation to the Green Belt;
- iv.) Not effective in relation to transport links;
- v.) Not effective in relation to cross-boundary impacts and the protection of residents opposite the Port Warrington site; and
- vi.) Not consistent with national policy protections from noise pollution.

We question whether the Plan is compliant with the Duty to Cooperate.

These reasons are elaborated below.

i.) Not justified as an appropriate strategy

The Moore Nature Reserve on the northern side of the Ship Canal is a designated Local Wildlife Site (LWS) shown in dark green hatching on the proposed Policies Map (reproduced on figure 1, page 3 of this representation). The Plan does not propose to delete the LWS, nor does it suggest that the LWS has less value than previously.

The LWS excludes the existing buildings as warehouses are not generally considered wildlife habitats.

Figure 7: Moore Nature Reserve



The allocation of land for warehousing is inconsistent with the Local Wildlife Site designation as it will inevitably replace large areas of habitat with large-scale buildings.

The explanatory text to the policy is misleading in suggesting that, “*The principle of the expansion of Port Warrington has also been established in previous Local Plans*” (paragraph 10.1.16) when the site remained identified as Green Belt and as a Local Wildlife Site on the Core Strategy 2015 Policies Map (reproduced on page 5 of this representation) and was limited in extent on the Core Strategy Key Diagram (reproduced on page 25 of this representation). The proposals represent a significant urbanising beyond what was envisaged in previous plans.

The proposed allocation of the LWS is not justified as it ignores major problems identified by the Council’s Sustainability Appraisal (SA) March 2019 in relation to the following objectives:

- Built and natural heritage objectives BNH1, BNH2, BNH3: “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.” – the site performs poorly (orange) against criteria BNH2 ‘effect upon heritage impacts’ and BHN1 ‘proximity to heritage impacts’.

- Biodiversity and Geodiversity objectives BG3 and BNH3: “Protect, maintain and enhance biodiversity and geodiversity.” – the site performs very poorly (red) against criteria BNH3 ‘Capacity for landscape to accommodate’ and GB3 ‘Potential Impact on Local Wildlife Site’. (SA page 50).

The SA notes on page 285 that, “*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.*” (SA page 285)

The Sustainability Appraisal concludes that, “*A significant negative effect arises though as a result of development at the Waterfront location. This involves the loss of a substantial part of Moore Nature Reserve, as well as being close to a range of further habitats and potentially affecting the environment along the Ship Canal and the Mersey Estuary. Though measures are proposed to mitigate such impacts (see site specific policies), a residual effect may well remain.*” (SA paragraph 9.12.16)

The Sustainability Appraisal acknowledges the significant harmful effects of this allocation and states in relation to Policy MD1 that:

“The Policy seeks to minimise impacts upon the environment, and crucially requires mitigation for the loss of part of the Moore Local Nature Reserve. In particular, there is a requirement for a net gain in biodiversity, which should help to minimise the potential for significant negative effects that would otherwise occur. Seeking to secure compensatory habitat in close proximity to the site is positive, as it will help to ensure that the wildlife corridor along the River Mersey is not severed. However, it will be important to secure wider benefits given that this part of Warrington will become urbanised.” (page 149, SA March 2019)

It is difficult to see how the harmful effects will be adequately mitigated under the current wording of the Policy. Moore Parish Council’s suggestions for necessary modifications are provided on page 17 of this representation.



Fig 8. Photo of site

ii.) Inconsistent with national policy regarding the environment

The allocation of a Local Wildlife Site for employment development is in direct conflict with the following sections of the National Planning Policy Framework, particularly chapter 15 which addresses 'Conserving and enhancing the natural environment':

- Paragraph 171: "*Plans should: distinguish between the hierarchy of international, national and locally designated sites; **allocate land with the least environmental or amenity value***" (my emphasis)
- Paragraph 174: "*To protect and enhance biodiversity and geodiversity, plans should....b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing for securing measurable net gains for biodiversity.*"
- Paragraph 180: Planning policies should, "*identify and **protect tranquil areas** which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason*" (my emphasis)

There are many alternative sites available to Peel Ports, as shown by Peel Port's consultation on their Mersey Ports Integration and Master Plan, attached as an **Appendix** to this representation. Peel Ports own consultation on its Mersey Ports Master Plan report (2011) identified 746 acres of land for expansion of its port facilities, of which the Port Warrington Phase 2 proposals comprised just 24 acres. This site is one of the most environmentally sensitive of the various sites in the 746 acre land portfolio. Alternatives for commercial port facilities on the Ship Canal have not been adequately explored with neighbouring local authorities.

The fundamental clash between the status of the site as a Local Wildlife Site and its proposed loss to large B8 buildings can only be overcome by deleting those parts of the allocation that overlap with the Local Wildlife Site and leaving the LWS designated as Green Belt.

To overcome the above soundness issues, the Green Infrastructure Strategy should incorporate the LWS in its entirety, including the wildlife corridor adjoining the Ship Canal. Changes to policy sub-sections 2, 17, 24 and 34 to make the Plan sound are described under 'Modifications' below.

iii.) Not consistent with national policy in relation to the Green Belt

There is a conflict between national Green Belt Policy and the removal of the site from the Green Belt, for the reasons set out under Policy GB1 above. This conflict can be resolved by the deletion of sub-sections 2 and 17 from the Policy.

iv.) Not effective in relation to transport links.

The Western Link is essential to the proposals to avoid the unacceptable impact of HGV traffic using the narrow roads across the Ship Canal and through Moore village. Moore Lane narrows to a single track in the two places where it crosses the railway and is unsuitable for significant traffic. It is essential that development does not take place until the Western Link is in place.

Figure 9. Moore lane where it crosses the railway bridges



Section 8 of the Policy rightly requires funding for the Western Link to be secured before planning consent will be permitted. Nevertheless, experience of major infrastructure projects is that the availability of funding and a confirmed programme do not necessarily translate into delivery on the ground. Too many large infrastructure projects across England are delayed or mothballed by events ranging from unexpected change in the economy to political or social shifts in opinion. It is therefore necessary to ensure that the Western Link is built before the construction of buildings commences on this allocation.

There has been a long history of failure to deliver infrastructure at Port Warrington. The Council has been trying for over 25 years to have a railhead connection at Port Warrington from the nearby railway line, without success to date.

Although Port Warrington adjoins the canal, it does not have any active facility to move goods from the canal into the warehouses. There is no *active* and operational crane and to our knowledge no goods have been moved direct from the canal into the warehouses since they were built. All goods are delivered by road.

The description of Port Warrington as an, “operational area” in paragraph 10.1.26 of the Plan is misleading, as it is only a warehouse facility and is not operational as a Port. We understand from local residents who have worked at the site that the crane on site has never been actively used for moving goods. The Plan should be honest that Port Warrington is in use for storage and has never been operational as a functioning port.

The impact of HGV traffic on Moore village from the operation of the expanded Port would be so harmful that the operation of the expanded Port Warrington should not precede the completion of the Western Link.

To make the Policy sound, modifications are required to policy sub-sections 7, 8 and 9 to ensure that the Western Link Road is not just planned, but delivered before development is operational.

v.) Not effective in relation to cross-boundary impacts

Under the Duty to cooperate, there has been ongoing engagement between Warrington Borough Council (WBC) and Halton Borough Council (HBC). However the minutes of the last meeting before publication of the Submission Local Plan show ongoing areas of dispute between the two local planning authorities. The minutes of a meeting between WBC and HBC on 7th February 2019 record that Alasdair Cross (AC) for HBC expressed concerns under item 5. Waterfront that, “*initial questions remain unanswered after over a year*” (DtC Record A minutes of meetings¹). We therefore question whether the Duty to Cooperate has been sufficiently met.

The proposals would have detrimental impact on the 80 homes at Promenade Park, Moss Lane, Moore. These represent a third of the parish’s residents. They lie directly opposite the proposed port and warehousing facility with the only buffer being open water on the Manchester Ship Canal, as shown on the aerial photograph below.

Figure 10: Aerial photograph of Promenade Park in relation to the Ship Canal



¹ <https://www.warrington.gov.uk/downloads/file/19348/record-a---minutes-of-meetings> - pages 99

To protect the residential amenity of neighbouring areas from noise and visual impacts of development, it is essential to have an acoustic barrier and a landscaped buffer between any commercial development on the north bank of the Ship Canal and the residents living opposite at Promenade Park, Moore. In the past Peel Developments have argued in relation to other ports in its portfolio that visual screening and landscaping reduces security. It is therefore essential to make it clear that a significant landscape buffer is essential.

To ensure the Plan is effective, modifications are proposed to policy sub-sections 24, 34, 55 and to the explanatory text under 'Modifications' overleaf.

vi.) Inconsistency with national policy protections against noise

The open water of the Manchester Ship Canal is insufficient to buffer noise and visual impacts and the current wording of the Policy is insufficiently strong to be compliant with national policy.

NPPF paragraph 170e requires that planning policies should enhance the local environment by: *“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.”*

NPPF paragraph 180 states:

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”*

To make the Plan consistent with national policy it is necessary to for it to be more specific in its wording.

Modifications are proposed as below to policy sub-section 55 and explanatory text 10.1.26 to make the Plan ‘sound’ in this regard.

Modifications necessary

~~2. In order to facilitate development, the southern section of the allocation site, comprising the 2 employment sites, will be removed from the Green Belt.~~

7. The masterplan will provide the basis for subsequent planning applications for individual phases of development. The Western Link must be included in Phase 1.

8. No development will ~~be permitted~~ commence until funding has been secured, ~~and a programme of delivery has been confirmed, and construction of~~ for the Western Link has finished.

9. The first operation/use of the expanded Port Warrington will be not be permitted until the expansion of either the berth or the rail freight connection has been completed and a programme for the implementation of the subsequent berth extension or railway infrastructure has been confirmed, and the Western Link is completed.

~~17. 78ha of land, including the existing established Port Warrington site which equates to 15ha, will be removed from the Green Belt immediately to the north of the Manchester Ship Canal at Port Warrington for port expansion and related uses (primarily B8 but also potential for B2). The Port will provide around 185,000 sq.m. of employment floorspace.~~

24. A Green Infrastructure Strategy will be required to be prepared for the Waterfront in order to ensure the provision of an accessible, comprehensive and high quality network of multi-functional green spaces, incorporating the existing Moore Nature Reserve and providing a new Green Infrastructure corridor along the north bank of the Ship Canal.

34. New and improved habitat should be created in the first instance within the Waterfront allocation site, with ~~part of Moore Nature Reserve~~ and new areas of wildlife friendly habitat to be incorporated into the new Country Park. If additional mitigation is required then this must be provided as close as possible to the Waterfront allocation site Ship Canal.

36. The developer must consult the Council, the Local Nature Partnership, Moore Parish Council and the local community in the preparing the plan of mitigation.

55. The design of the employment area must protect the amenity of the residential area within the Waterfront and protect the amenity of existing residents to the south of the Manchester Ship Canal in Halton with landscaped buffers and suitable acoustic barriers. All proposals must also fully meet policy ENV8.

Explanatory text

10.1.22 The expansion of Port Warrington will result in the loss of part of Moore Nature reserve and a number of important ecological assets. It is therefore an essential that a comprehensive mitigation package is in place before development is approved. A new Green Infrastructure corridor along the north side of the Ship Canal must be provided as required in Policy DC3f.
(please refer to our representations on policy DC3)

10.1.26 Although Port Warrington has been in existence as ~~an operational a storage area for~~ decades, it is located in a sensitive location with regard to the Green Belt that separates Warrington from Runcorn and Warrington from Widnes. There is also an existing residential community directly opposite the Port in Halton. The allocation policy and Policy ENV8 therefore will ensure a strong Green Belt boundary and that measures are put in place to protect the amenity of existing and future residents.

PART B - Representation Form

1. To which part (chapter/policy) of the Local Plan does this representation relate?

Policy MD3 The SW Urban Extension

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)?

Policy sub-numbers:

MDA3.2 Delivery and phasing

1. Size of the urban extension

2. Number of dwellings

4. Consultation with statutory consultees and the local community

7. Western Link road

MD3.3 Detailed site-specific requirements

14. Density of development

21. Green Infrastructure Strategy

30. Western boundary of the site

31. Strategic Gap to maintain the separate identify of Moore village

32. Development at the western extent of the site

3. Do you consider the Draft Local Plan is: Do you consider the Draft Local Plan is:

	Yes	No
Legally Complaint	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Policy MD3 is unsound because it is:

- i.) Not Justified an appropriate strategy due to its inconsistency with objective W2 and not consistent with NPPF paragraphs 133 & 134;
- ii.) Not Justified because it is based on a deeply flawed Green Belt Assessment
- iii.) Not consistent with national policy NPPF paragraph 138;
- iv.) Not Effective as the Strategic Gap referred to is not based on effective joint working and its delivery is not assured by the current policy wording.
- v.) Not Effective and deliverable over the plan period in relation to the Western Link Road.
- vi.) Not Justified as an appropriate strategy in relation to objective W4.

i.) Not Justified in relation to Objective W2 and Not Consistent with national policy

The South West Urban Extension will bring urban development to 250 metres from houses in Moore village, dramatically reducing the gap between Warrington and the historic Moore village and resulting in an effective merging of Warrington with the built up area of Halton.

Local Plan Objective W2 is, *“To ensure Warrington’s revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.”* Objective W2 reflects NPPF paragraph 133 which states that, *“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.”* We consider the South West Urban Extension has such a significant impact on the Green Belt between Warrington and Halton that it is fundamentally contrary to Objective W2 and NPPF 133.

NPPF paragraph 134 defines five purposes of the Green Belt. The South West Urban Extension offends purpose (b) *“to prevent neighbouring towns merging into one another”* as well as purpose (a) *“to check the unrestricted sprawl of large built-up areas”*, purpose (c) *“to assist in safeguarding the countryside from encroachment”* and (d) *“to preserve the setting and special character of historic towns.”* The South-West Urban Extension will result in a fundamental undermining of the purposes of the Green Belt between Warrington and Runcorn. Please see our representation on policy GB1 which provides our detailed case in this regard.

To make the Plan sound, the gap should be increased in size, either by deleting the South West Urban Extension to the Plan in its entirety, or if the Urban Extension remains, by increasing the density of development and reducing its land area with changes to sub-policies 1, 2 and 30 to roll back its boundary. An appropriate new boundary would be Mill Lane and the field boundary north of Grange Green Manor to the point where the railway line crosses the Ship Canal. If the Plan were to genuinely seek to preserve a Green Belt gap between Warrington and Halton, it must prioritise the purposes of the Green Belt over other considerations (such as density) in order to achieve this.

ii.) Flaws in the Green Belt Assessment

The policy is not justified because the GB assessment is not robust. Please see our detailed discussion of the inadequacies of the GB assessment under our representation on Policy GB1 on pages 2-12 of this representation.

To make the plan sound, the Policy should either be deleted in its entirety or the allocation reduced in scale through modifications to Policy sub-numbers 1 & 2.

iii.) **Inconsistency with national Green Belt policy NPPF 138**

NPPF paragraph 138 requires local planning authorities to: “*set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*”

Policy MD3 fails to be consistent with this part of national policy because as currently phrased, the policy fails to require any improvements whatsoever to the quality or accessibility of the remaining Green Belt land.

The Plan will leave an impractical, narrow Strategic Gap of approximately 250 metres of Green Belt between the new housing development and the edge of Moore village. This is an insufficient quantity of Green Belt to provide genuine improvements in the environmental quality and accessibility of the Green Belt. A wider gap is necessary to enable national policy to be achieved.

The Plan’s overall intention for a positive use of the Green Belt is reflected in sub-section 2 of Policy GB1 Green Belt which states that, “*The Council will plan positively to enhance the beneficial use of the Green Belt as part of Warrington’s Green Infrastructure Network.*” However this aspiration is not reflected in practice in the detailed wording of Policy MD3.

To achieve consistency with NPPF 138 and Policy GB1.2 will require reduction in the size of the urban extension and the number of dwellings, with modifications to Policy sub-numbers 1 & 2, and modifications to require Green Infrastructure improvements in Policy sub-numbers 21 and 32 as set out under ‘Modifications’ below.

iv.) **An ineffective Strategic Gap**

We note concerns have been raised by Halton Borough Council throughout the Local Plan process in relation to the Green Belt gap between the two urban areas. While Halton Borough Council have made major changes to their emerging Local Plan to reflect cross-boundary working, this appears to be largely one-sided and calls into question whether the Warrington Local Plan is based on effective joint working. Modifications are necessary to meet this test of soundness.

Sub-policies 31 and 32 refers to a ‘Strategic Gap’ between the urban extension and Moore village. This is a narrow strip only 250 metres wide between the edge of the urban extension and the first houses in Moore village. At the time of writing, it is currently in use by railway contractors for maintenance of the railway line as shown in figures 10 & 11 overleaf. The gap is dominated by high voltage electricity pylons and a plethora of field boundaries separating relatively small equestrian paddocks with menage and other paraphernalia. It is not an effective strategic gap.

A much wider strategic gap is necessary to retain the Green Belt separation and meets Local Plan Objective W2 and NPPF paragraph 138 in relation to the permanence of the Green Belt.

Fig 11. The 'Strategic Gap' viewed from Bellhouse Lane, looking west towards Moore Lane



Fig 12. The 'Gap' viewed from Moore Lane railway bridge, looking east to Bellhouse Lane.



The so-called Strategic Gap is ineffective; its extent is not defined on the policies map and there is no detail in Policy MD3 as to how the strategic gap will be protected. Its extent is not shown on the illustrative concept plan or described in the explanatory text. In light of this, it is difficult to see how the Plan will achieve the objectives set out in the explanation to the policy:

“10.3.15 The Green Belt in this part of Warrington is of key significance ensuring the separation of Warrington and Runcorn.....

10.3.16 It is also important that the area of Green Belt between the western extent of the urban area and Moore Village is protected as a Strategic Gap to ensure the separate identity of Moore Village.”

To be effective, the policy requires modifications to ensure a genuine separation and an effective Strategic Gap that is honoured by decision-making on planning applications. Modifications are proposed to policy sub-sections 30-32 to ensure this.

It is essential that the Strategic Gap is shown on the Policies Map.

To be effective, policy sub-section 4 should also refer explicitly to Halton Borough Council and Moore Parish Council.

v) Not effective in delivering the Western Link

The Plan recognises in paragraph 10.3.17 of the explanatory text that, *“Access to the site is currently dependent on the A56 Chester road. This is extremely congested during peak hours, with limited access over the Ship canal. The scale of the South West Urban Extension cannot be accommodated by the A56. This means that it is essential that development is coordinated with the delivery of the Western Link.”*

Having acknowledged that the SW Urban Extension requires delivery of the Western Link, it is essential that the policy reflects this. It currently does not.

The policy is not effective because the current policy wording provides a loophole that could allow the SW urban extension to be developed without the delivery of the Western Link Road. Sub-policy 7 requires funding to be secured and a programme of delivery to be confirmed, but this itself does not guarantee that the Western Link Road will be built. Many road schemes have floundered *after* the programme has apparently been confirmed, due to economic, social or political changes.

A recent example of funding not resulting in delivery is the proposed new Cantilever bridge, which has £55million allocated in the Local Transport Plan (LTP4). This bridge has been planned since the 1970s as an integral part of the development of South Warrington. The Council’s Transportation Service Manager Steve Hunter recently stated² that there was no imminent plan to build the bridge despite the funding.

To ensure delivery, it is necessary to clearly state that development must be accompanied by the *construction and completion* of the Western Link. The section

² WBC briefing session on 23rd April 2019

106 agreement accompanying any planning consent should require the Western Link to commence before construction of the residential units can commence.

vi) Not justified as an appropriate strategy in relation to objective W4.

The Plan's Objective W4 is, "*To provide new infrastructure and services to support Warrington's growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.*" The South West Urban Extension will not achieve this because it is located in an area that already suffers severe congestion and it will worsen rather than improve the situation. The Plan justifies the SW Urban Extension in part as delivering the Western Link, but this will only be a single carriageway road and will not deliver the Plan's objective W4.

The Western Link road will not make a significant difference to congestion as it will largely only accommodate the traffic generated by Port Warrington, the Waterfront developments and development in South Warrington. It will not make a radical difference to existing congestion.

One of the root causes of Warrington's congestion is commuting. The high level of commuting into and out of the Borough was identified as a key sustainability issue for the Plan in Table 2.1, page 5 of the Sustainability Appraisal March 2019. The Economic Development Needs Study 2019 provides detailed evidence from the 2011 census, showing a net daily commuting inflow into Warrington Borough of 14,179 commuters per day, with the largest numbers of these flows being from Wigan with 4,539 net movements per day and from St. Helens with 4,288 net movements per day. This strongly suggests a need for residential development to the north of Warrington rather than the south of Warrington.

The Plan makes no reference to the new Mersey Gateway bridge. This has provided a strategic new crossing of the River Mersey and the Ship Canal and consequently the Western Link has been downgraded in importance.

In summary, the South West Urban Extension is no longer required and should either be deleted in its entirety or substantially reduced in size.

Modifications necessary

To make the Plan sound the following changes are necessary, with proposed additions underlined and proposed deletions ~~crossed through~~:

Ideally Moore Parish Council would prefer the deletion of Policy MD3 in its entirety. Failing this, detailed changes to the policy sub-numbers are proposed as below:

MD3.1 Key Land Use and Infrastructure Requirements

1. Land comprising approximately 442-75ha to the south west of Warrington will be removed from the Green Belt and allocated as a sustainable urban extension.

2. The allocation will deliver a new residential community of around ~~4,600~~ 1,000 homes, supported by the following range of infrastructure.

MDA3.2 Delivery and phasing

4. The masterplan must ~~confirm~~ conform to the requirements of this policy and be subject to consultation with statutory consultees and the local community including Halton Borough Council and Moore Parish Council.

7. No development will ~~be permitted~~ commence until funding has been secured, ~~and a programme of delivery has been confirmed, and construction of~~ for the Western Link ~~has finished~~.

MD3.3 Detailed site-specific requirements

14. To reflect the site's urban fringe location adjacent to the ~~open countryside~~ Green Belt the development will be constructed to an average minimum density of ~~30~~ 40dph.

21. A Green Infrastructure Strategy should be prepared as part of the masterplan for the urban extension in order to ensure the provision of an accessible, comprehensive and high quality network of multi-functional green spaces and to provide compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

30. The western boundary of the site, comprising ~~the Bridgewater Canal, Holly Hedge Lane and Bellhouse Lane~~ Mill Lane and the field boundary between Grange Green Manor and the railway crossing of the Ship Canal, defines the Green Belt boundary.

31. the Green Belt between the urban extension and Moore village, as identified on the Policies Map, will also be protected as a Strategic Gap to maintain the separate identify of Moore village.

32. Development at the western extent of the site will be required to respect the Green Belt boundary and contribute to maintaining the Strategic Gap between the urban extension and Moore village, by providing green infrastructure that enhances the visual separation of the two settlements.

PART B - Representation Form

1. To which part (chapter/policy) of the Local Plan does this representation relate?

DEV1 Housing Delivery (linked to reps on policy MD3)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)?

Sub-policy
3b South West Urban Extension

3. Do you consider the Draft Local Plan is: Please 'x' one option in each row.

	Yes	No
Legally Compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Policy DEV1 is unsound because it is:

- Not consistent with national policy on Green Belts
- Not Justified because it is based on a deeply flawed Green Belt Assessment; and
- Not Justified as an appropriate strategy due to its inconsistency with objective W2, Policy GB1 and Policy MD3.

These reasons are elaborated in our representations on Policy MD3.

Policy MD3 refers to “*around 1,600 homes*” whereas Policy DEV1 refers to a “*minimum capacity of 1,631 homes*”. This is inconsistent and needs modification for clarity and the Plan’s internal consistency, in addition to the soundness concerns raised under Policy MD3.

Modifications necessary

To make the Plan sound, the following changes are necessary:

Policy sub-number:

3b. South West Extension – ~~minimum~~ maximum capacity of ~~1,631~~ 1,000 homes to be delivered in full in the Plan Period.

PART B - Representation Form

1. To which part (chapter/policy) of the Local Plan does this representation relate?

Policy DC3 Green Infrastructure Network

(linked to reps on policies MD1 & MD3)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)?

Sub-policy 3. Connecting Green Infrastructure with communities

Paragraph 8.3.15 – application of the Policy

3. Do you consider the Draft Local Plan is: Please 'x' one option in each row.

	Yes	No
Legally Compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Policy DC3 is unsound because it is:

- Not effective because it does not reflect joint working with Halton Borough Council on cross-boundary matters;
- Not effective because it does not deliver its aspirations in relation to the right of way along the northern bank of the Ship Canal;
- Not effective because it does not deliver its aspirations in relation to the Strategic Gap between the South West Urban Extension and Moore village.

Reasons why Policy DC3 is unsound

Policy DC3 aspires to meet Objective W5 to, “*secure high quality design which reinforces the character and local distinctiveness of Warrington’s urban area, its countryside, its unique pattern of waterways and green spaces and its constituent settlements whilst protecting, enhancing and embracing the Borough’s historic, cultural, built and natural assets.*”

Green Infrastructure also plays a vital role in supporting Objective W4 to, “*provide new infrastructure and services to support Warrington’s growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles*”.

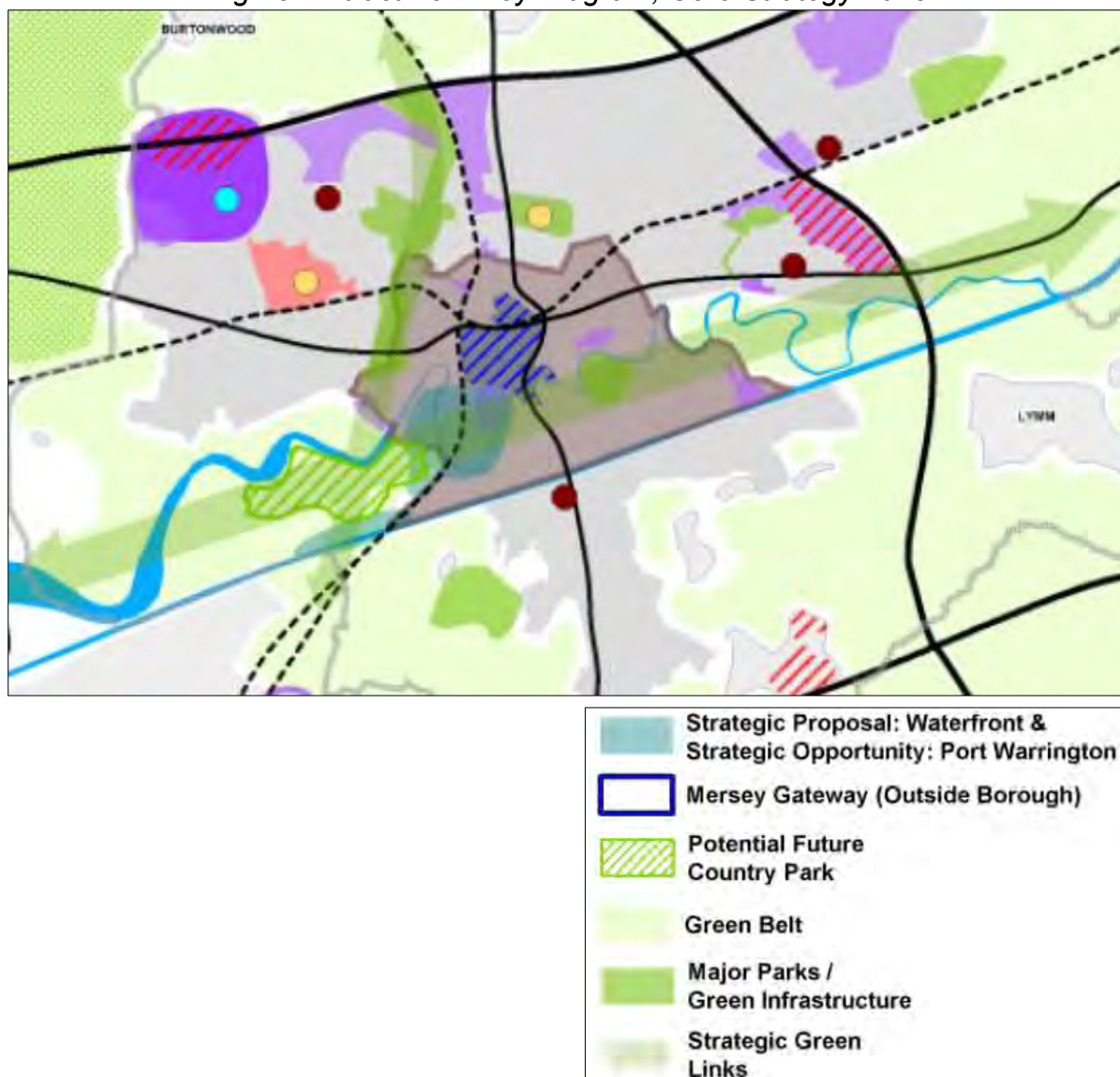
While the objectives and aims of the Policy are commendable, the Plan fails to be effective in relation to securing Green Infrastructure along the northern bank of the Ship Canal and in the Strategic Gap between the South West Urban Extension and Moore Village. It fails to make any mention of these key boundary locations, despite issues being raised during discussions with Halton Borough Council on cross-boundary matters.

The Plan will not be effective in delivering the Green Infrastructure that it seeks unless it makes clear reference to two key areas where the Plan proposes major development, namely:

- a) the right-of-way through the Warrington Waterfront allocation, and
- b) the Strategic Gap separating the South West Urban Extension and Halton Borough.

The Strategic Gap offers an opportunity to realise the north-south Strategic Green Links shown as green arrows on the Key Diagram of the 2015 Core Strategy, connecting the Local Nature Reserve on the north side of the Ship Canal with new landscaping south of the Ship Canal on the western edge of the South West Urban Extension.

Fig 13. Extract from Key Diagram, Core Strategy 2015



In addition to changes to Policies MD1 and MD3, Policy DC3 should be modified to address these soundness concerns as set out below.

Modifications necessary

Policy sub-number 3.

The Council is committed to supporting wider programmes and initiatives which seek to connect the borough's Strategic Green Infrastructure assets with residential communities, employment areas and other green infrastructure assets both within and outside of the borough, including:

f. The Ship Canal corridor, and

g. The Strategic Gap between Moore and the South West Urban Extension.

Explanatory paragraph:

8.3.15 To maximise the social, economic and environmental benefits of green infrastructure the Council is promoting an integrated approachAlongside this the Council will also seek to ensure that opportunities to improve the quality of the network, to the benefit of both people and wildlife, are taken, as well as opportunities to connect areas of fragmentation so as to create a continuous right of way network and integrated ecological system throughout the borough. Large scale developments including the South West Urban Extension and Warrington Waterfront proposals will showcase improvements to Green Infrastructure in relation to the Strategic Gap with Halton Borough and the Moore Nature Reserve respectively.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please 'x' one option.

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination** (I understand details from PartA will be used for contact purposes)

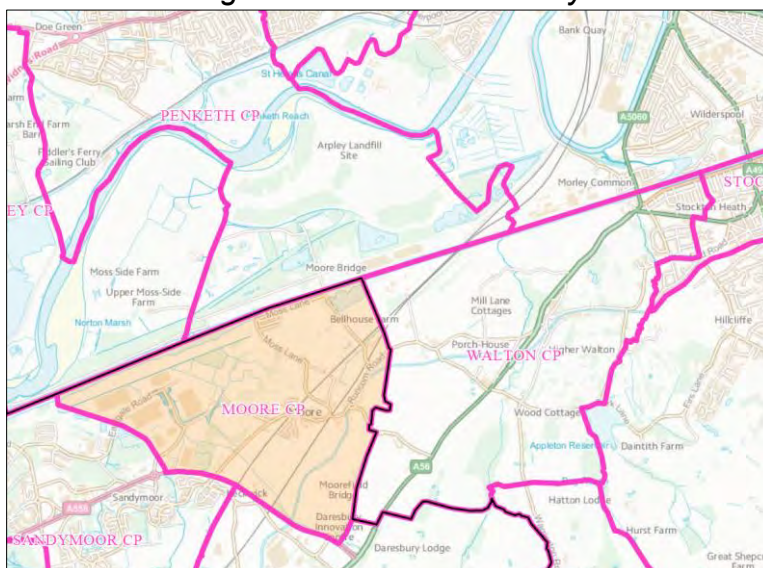
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The proposed Port Warrington and SW Urban Extension in the Green Belt north and east of Moore will have a significant effect on the Parish that Moore Parish Council wish to be closely involved in the examination hearings.

Traffic from Port Warrington and south-west Warrington travels through Moore village and nearly half of the Parish's residents live at Promenade Park opposite the Ship Canal.

For the Inspector's information, the geographical extent of Moore Parish is shown in orange shading below. The black boundary represents the Warrington / Halton Unitary Council boundary. Two thirds of the Moore Parish boundary adjoins Warrington Borough.

Figure 14: Parish Boundary



8. If you wish to attach documents to support your representation form then please submit with your response and provide a description of each document in the box below.

Comments / file description

Peel Ports Mersey Ports Integration Strategy and Master Plan

Mersey Ports Integration Strategy | Plan 1

PORT OF LIVERPOOL

Seaforth River Terminal

A5036

CITY OF LIVERPOOL

BIRKENHEAD DOCKS

M53

Eastham Locks

Port Wirral

Port Bridgewater

Ellesmere Port Docks

Stanlow Terminal

Port Ince

LIVERPOOL JOHN LENNON AIRPORT

MANCHESTER SHIP CANAL

MANCHESTER

MANCHESTER AIRPORT

Port Salford

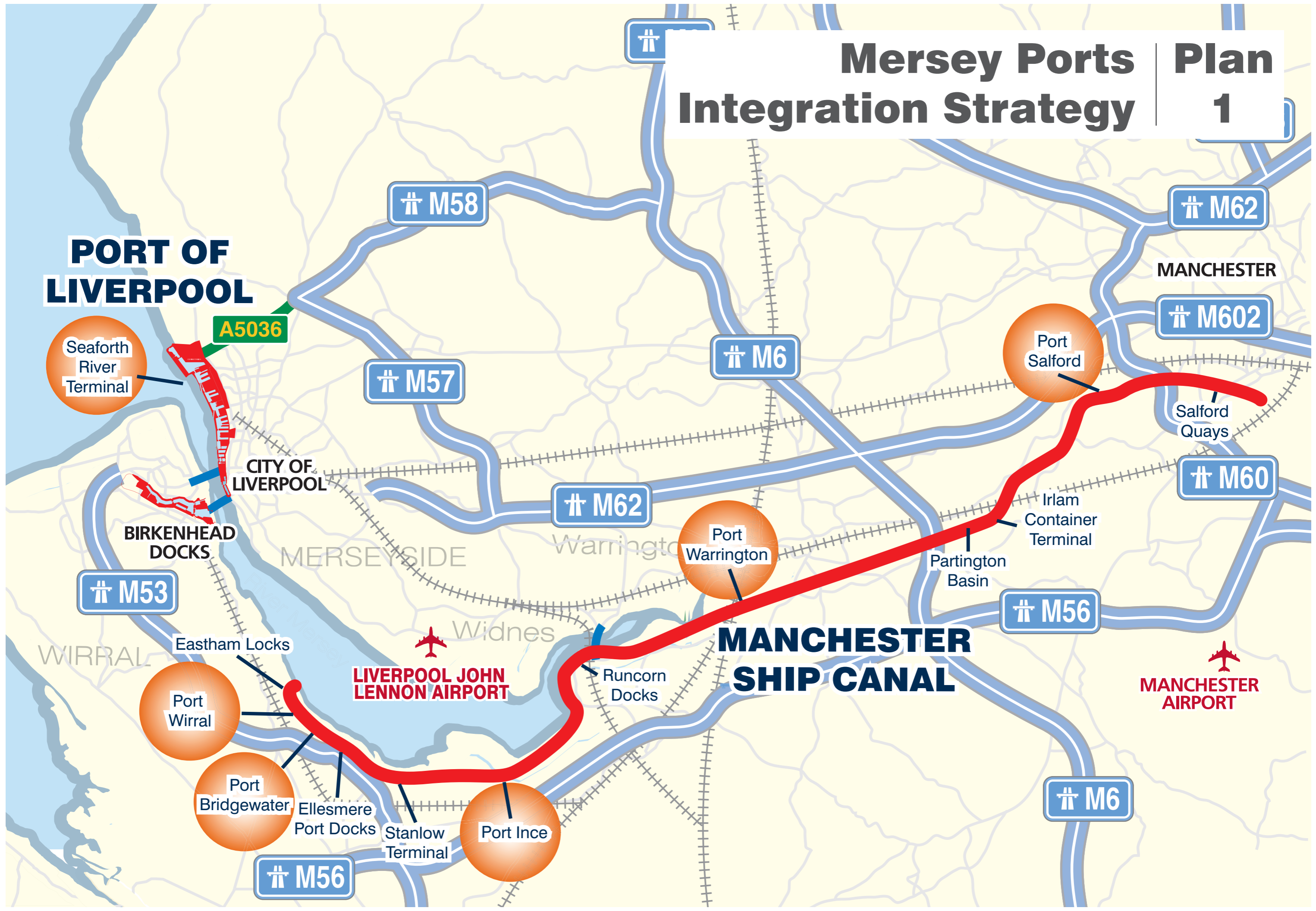
Salford Quays

Irlam Container Terminal

Partington Basin

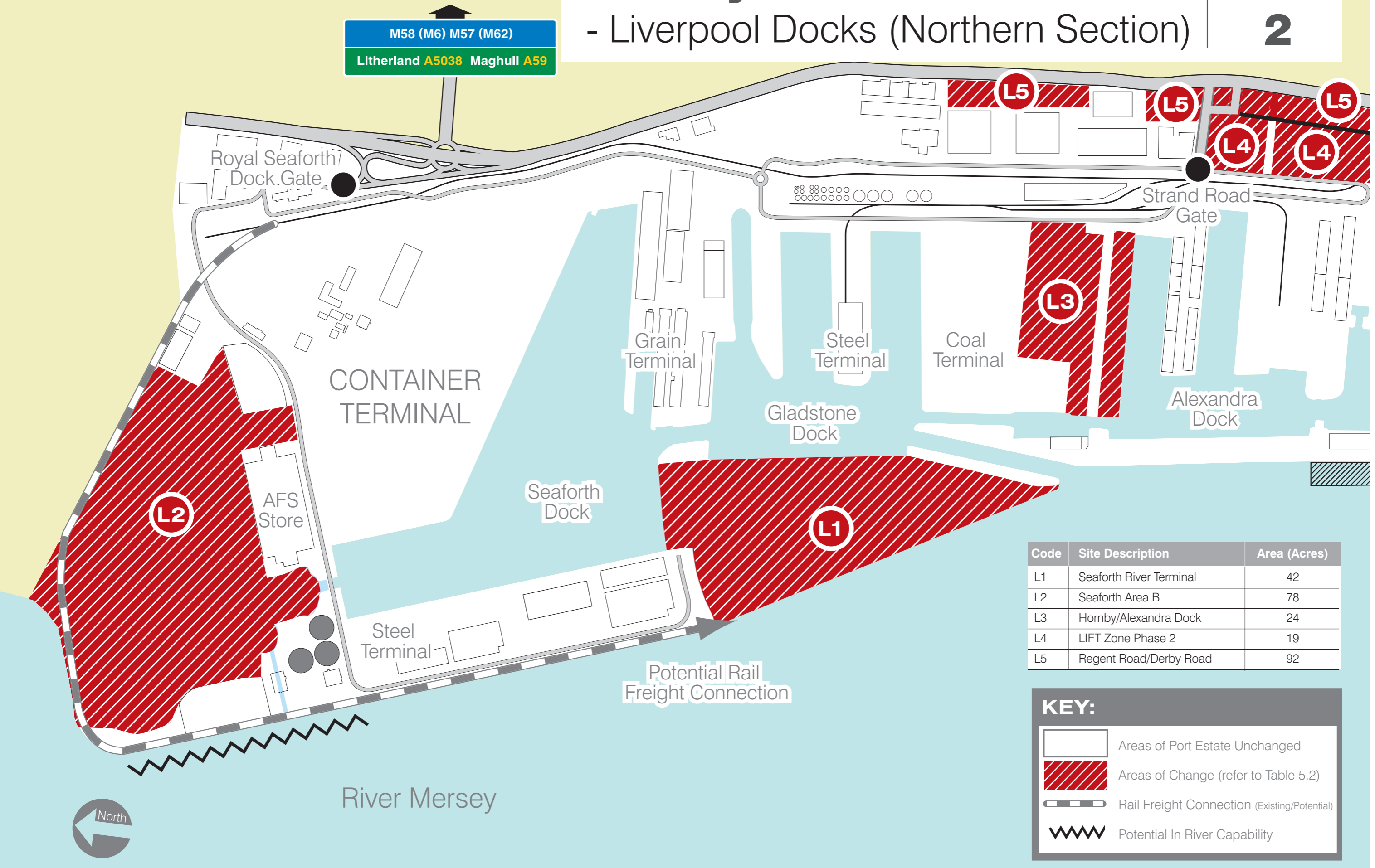
Port Warrington

Runcorn Docks



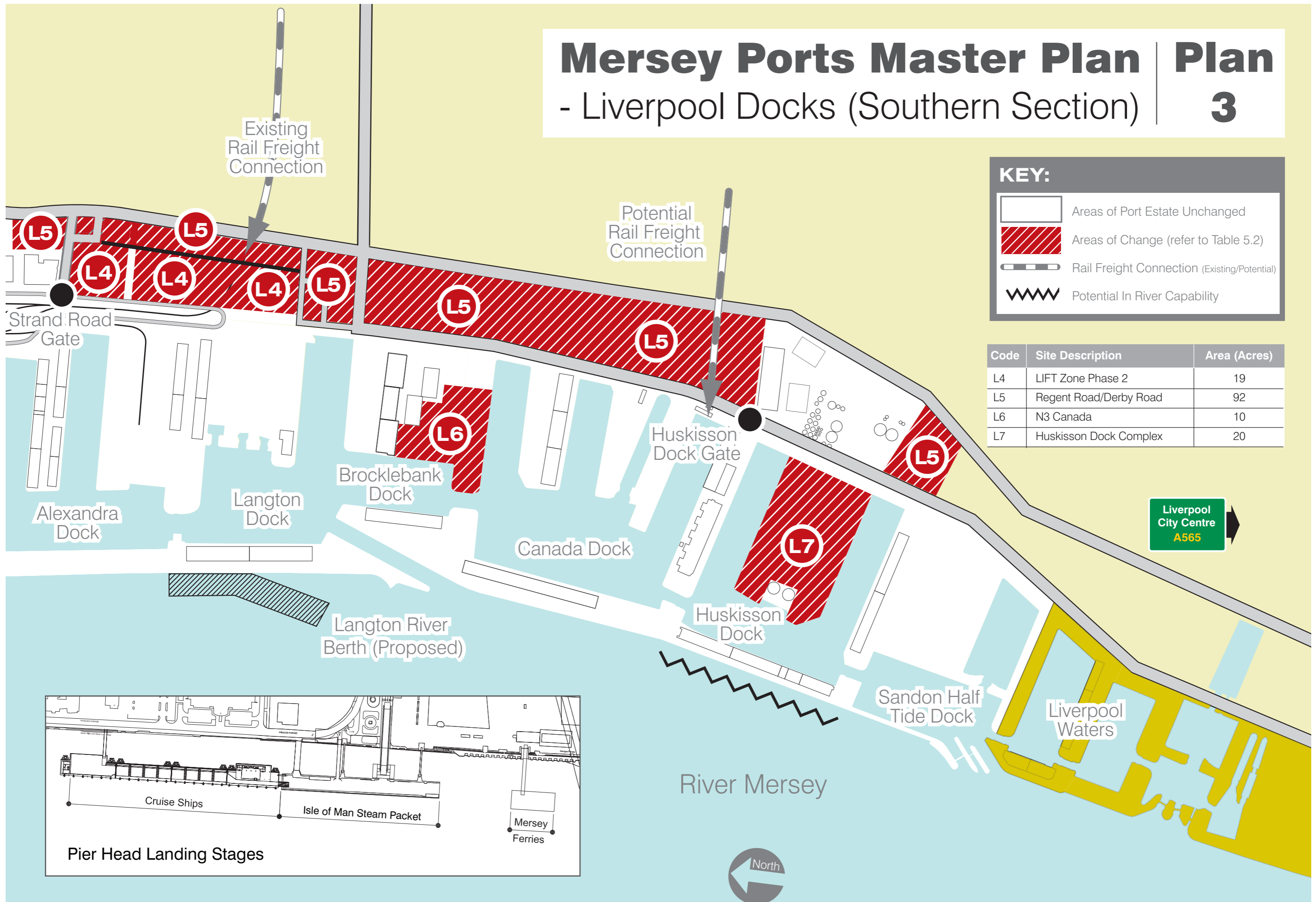
Mersey Ports Master Plan | Plan 2

- Liverpool Docks (Northern Section)



Mersey Ports Master Plan | Plan 3

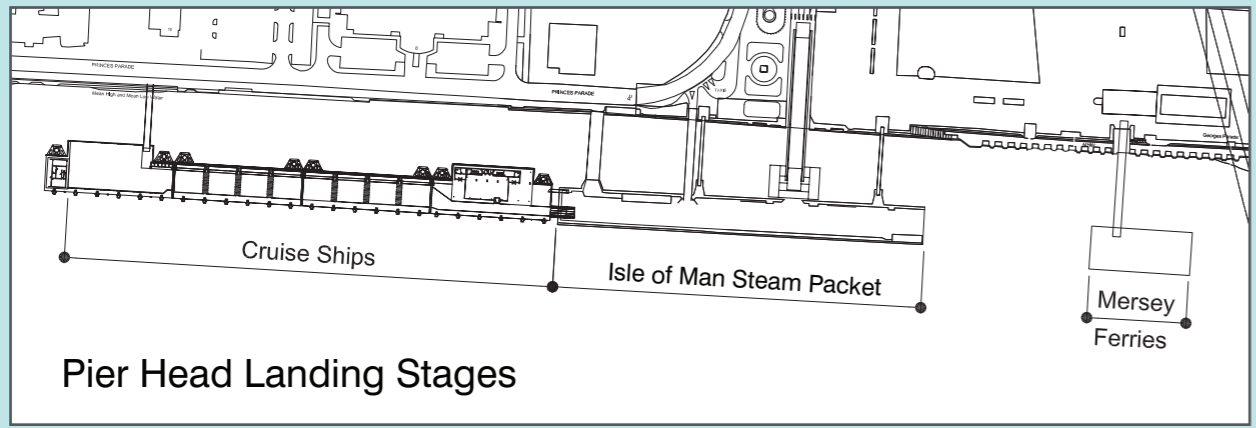
- Liverpool Docks (Southern Section)



KEY:

- Areas of Port Estate Unchanged
- Areas of Change (refer to Table 5.2)
- Rail Freight Connection (Existing/Potential)
- Potential In River Capability

Code	Site Description	Area (Acres)
L4	LIFT Zone Phase 2	19
L5	Regent Road/Derby Road	92
L6	N3 Canada	10
L7	Huskisson Dock Complex	20

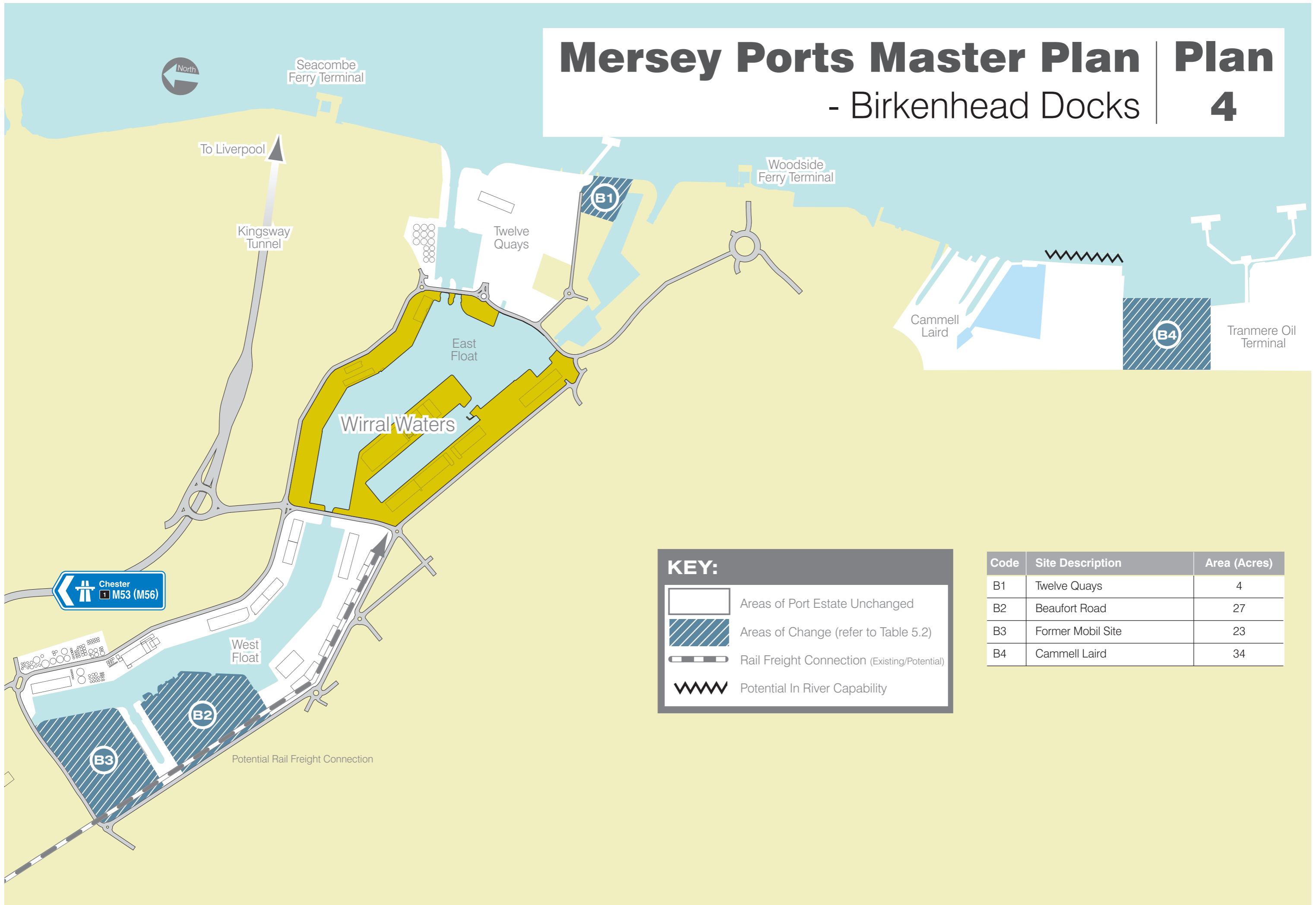


Liverpool City Centre
A565



Mersey Ports Master Plan | Plan 4

- Birkenhead Docks



KEY:

- Areas of Port Estate Unchanged
- Areas of Change (refer to Table 5.2)
- Rail Freight Connection (Existing/Potential)
- Potential In River Capability

Code	Site Description	Area (Acres)
B1	Twelve Quays	4
B2	Beaufort Road	27
B3	Former Mobil Site	23
B4	Cammell Laird	34

WIRRAL

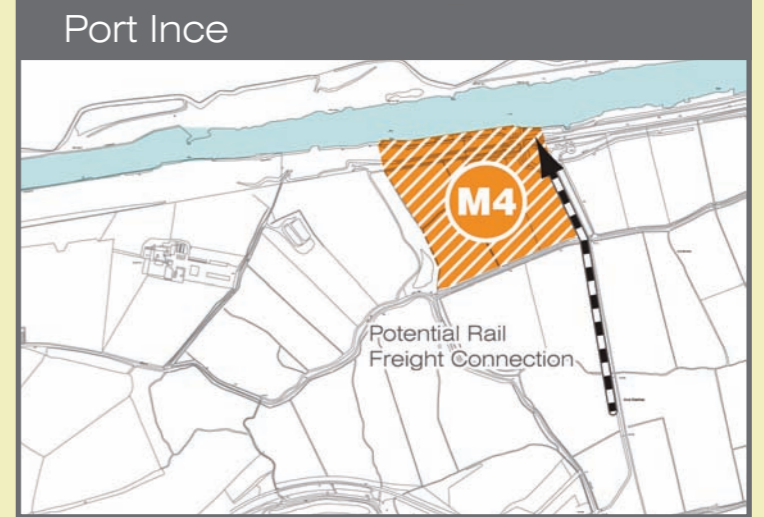
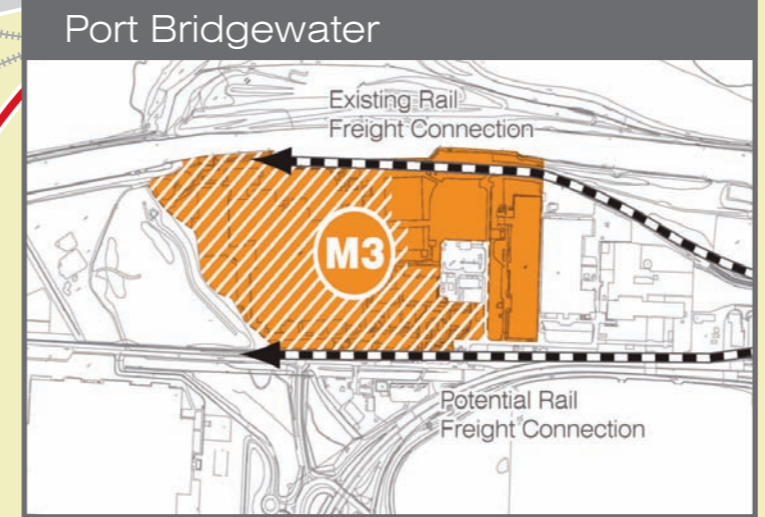
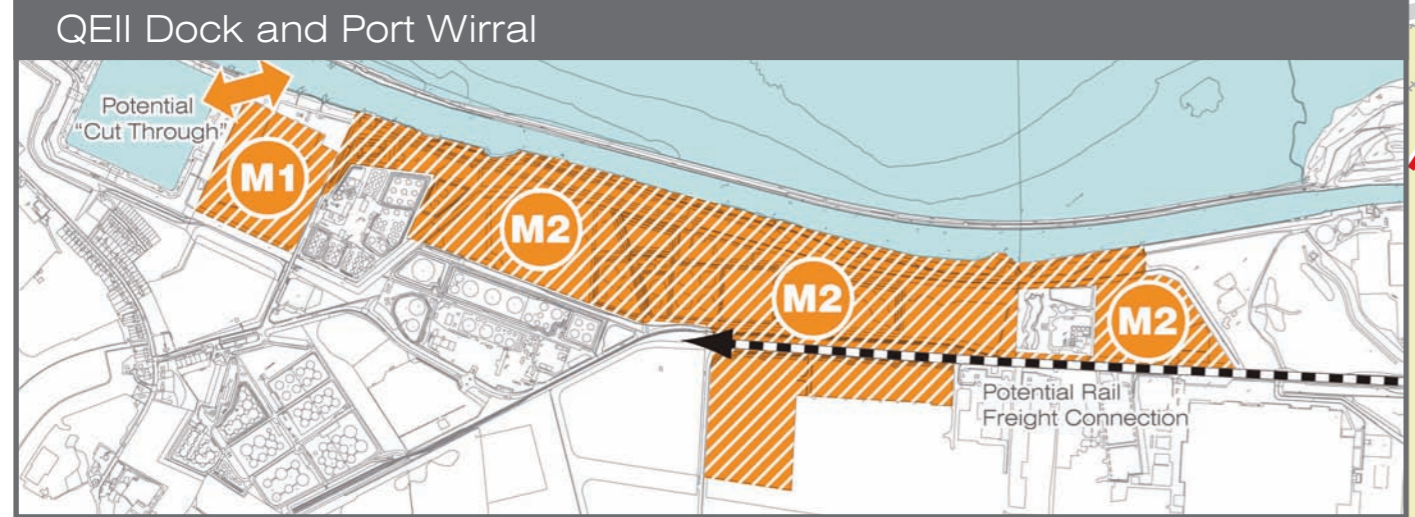
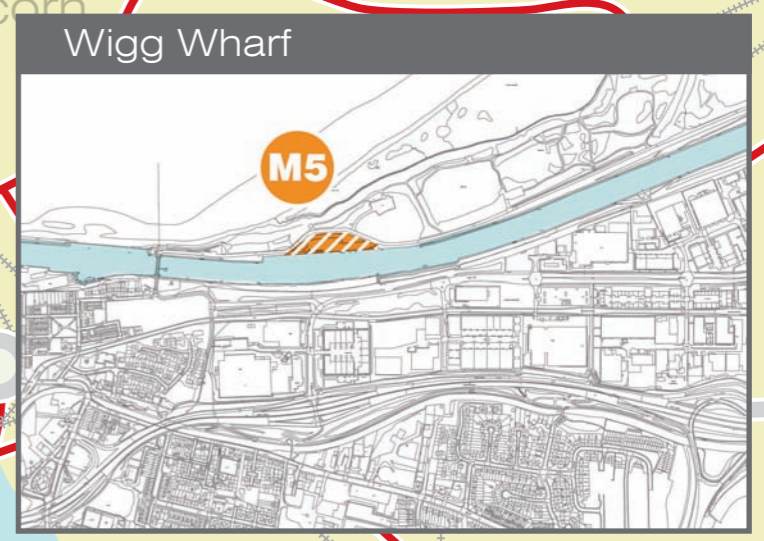
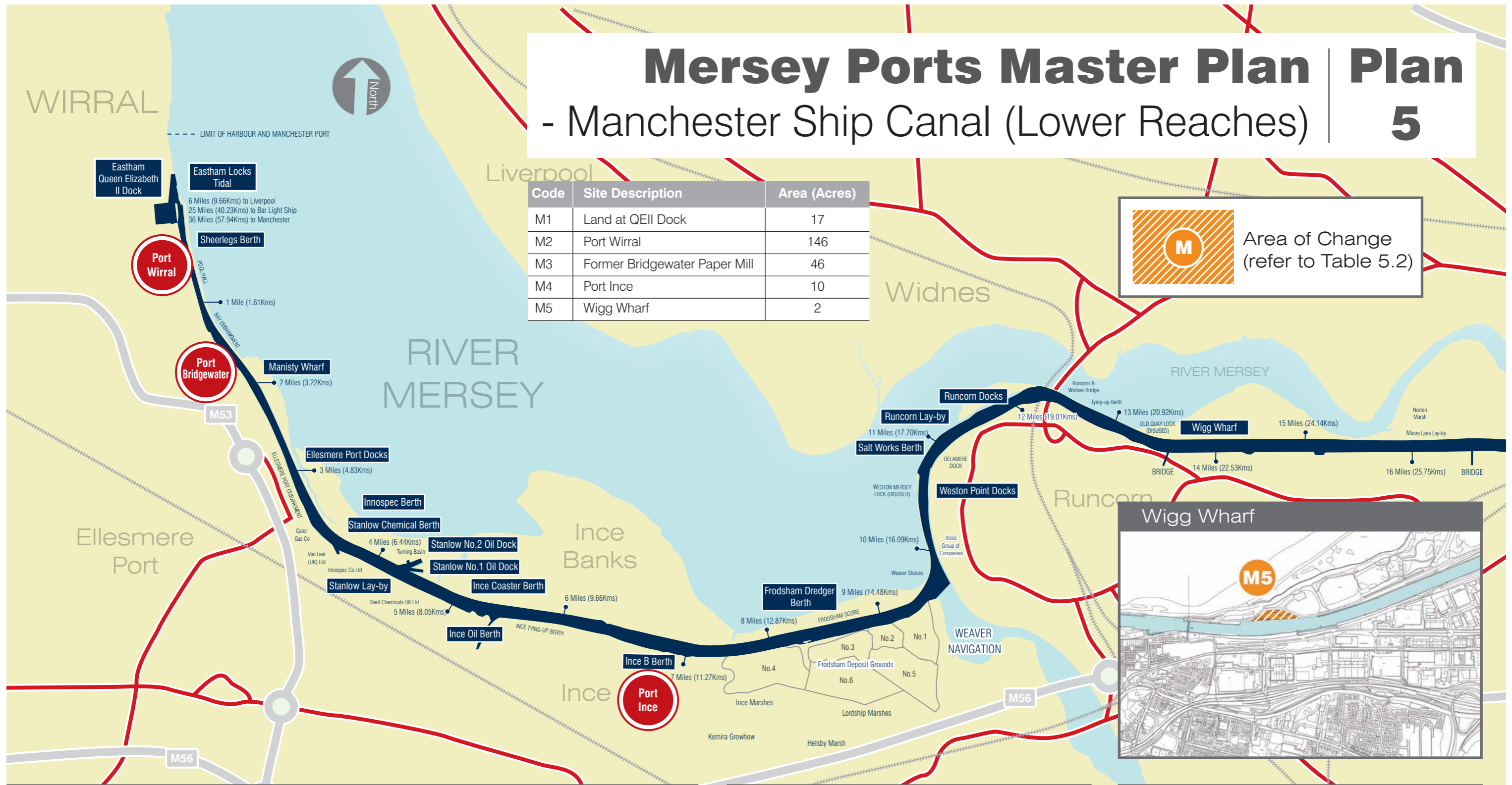


Mersey Ports Master Plan | Plan 5

- Manchester Ship Canal (Lower Reaches)

Code	Site Description	Area (Acres)
M1	Land at QEII Dock	17
M2	Port Wirral	146
M3	Former Bridgewater Paper Mill	46
M4	Port Ince	10
M5	Wigg Wharf	2

Area of Change (refer to Table 5.2)



Mersey Ports Master Plan | Plan 6

- Manchester Ship Canal (Upper Reaches)

M Area of Change (refer to Table 5.2)

Code	Site Description	Area (Acres)
M6	Port Warrington Phase 1	11
M7	Port Warrington Phase 2	24
M8	Irlam Container Terminal	6
M9	Port Salford	111

