

Cheshire West & Chester Council

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Date: 7 June 2019

Dear Michael,

Consultation on Proposed Submission Version Local Plan 2019

Thank you for consulting Cheshire West and Chester Council (CWAC) on the Proposed Submission Version Local Plan for Warrington. Clearly, a significant amount of work has gone into the Plan and the accompanying evidence base and we welcome the opportunity to comment on it. Throughout the Plan preparation process, Warrington Council has engaged constructively with CWAC over potential cross-boundary strategic issues and the authorities have worked together with Cheshire East Council to prepare a draft Statement of Common Ground (SoCG), as now required by the NPPF.

The draft SoCG identifies the following key strategic matters where CWAC is identified as a partner body:

- Housing Need across adjacent Local Authority Areas
- Green Belt
- Proposed Strategic Site Allocation – Garden Suburb
- Gypsy and Traveller and Travelling Showpeople accommodation needs within Cheshire
- Minerals and Waste – while CWAC is not specifically identified, Warrington prepares their Local Aggregate Assessment and Waste Needs Assessment with bodies that have a duty to cooperate relationship with CWAC

These matters broadly agree with those identified by both authorities as part of the development of CWAC's Local Plan (Part One), which was adopted in January 2015, and which provides the overall vision, strategic objectives, spatial strategy and strategic planning policies for the Cheshire West and Chester up to 2030. This Plan established that the

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borough was a self-contained housing market area and that future housing need could be met without substantial Green Belt release. Therefore CWAC agrees with the evidence presented in your consultation which affirms that Cheshire West and Chester is identified as part of a self-contained local housing market area, separate from Warrington, although it is recognised that there are limited movements between the two authorities. It is also identified that the boroughs do not operate as a functional economic area as the evidence demonstrates that the LEP boundary is not reflective of Travel to Work areas. Cheshire West and Chester agree with this assessment which also reflects the evidence base used to prepare the CWAC Local Plan (Part One).

It is noted that Warrington's Local Plan is focused on the provision of land to meet Warrington's objectively assessed need for housing and for economic development and a growing local economy. Most, if not all, adjoining authorities will also be planning positively for economic growth which will require the retention and attraction of working age people. The National Planning Policy Framework is very clear that Local Plans should be aspirational but deliverable and it follows that the strategic policies should make sufficient provision for housing, employment and infrastructure.

While CWAC recognises the work that has been undertaken to date and the commitment to working with neighbouring authorities and key bodies such as Highways England; the Council has some concerns relating to the proposed Green Belt release and significant allocations for housing and employment development at: MD1 Warrington Waterfront, MD2 Garden Suburb and MD3 South West Urban Extension, which collectively have the potential to impact on both CWAC's road network and the Strategic Road Network (including the M56 and M6). CWAC would therefore wish to fully understand these impacts and whether mitigation is necessary. CWAC considers that the locations with potential capacity issues include:

- M56, Junction 10 – linking A559 back to Northwich
- M6, Junction 20 – main link back onto M6
- M6, Junction 19 – linking A556 back to Northwich

In relation to the 'Warrington Proposed Submission Version Local Plan 2017-2037 (March 2019)' (or other issues) CWAC has the following comments:

Policy DEV1

- CWAC supports Warrington's intention to plan to meet its objectively assessed housing need in full within the borough and recognises the modest uplift above the standard housing methodology to meet the Council's growth aspirations.
- As this is largely to be met through Green Belt release, CWAC would like to be content that the policy is effective and to fully understand the implications, particularly for the highways network within Cheshire West and Chester, of the housing and employment development proposed under policy DEV1.

Policy INF1

- CWAC supports this policy, but suggests that to be effective, criterion 1(f) should be widened to include the provision of mitigation measures on the road network outside of

Warrington's Transport Network to address any adverse impacts from new development that may be felt in other boroughs.

- In addition, to ensure that the policy is effective, Criterion 1(i) should also be clarified in terms of what impacts on the Strategic Road Network are being assessed (are these from the development itself or transport initiatives outside of the borough?), and that mitigation measures within the wider region must be provided if adverse impacts will be caused by the new development.

Policy ENV4

- The policy text identifies that the Warrington land bank for sand and gravel has fallen below the required 7 years (based on the 2018 Local Aggregate Assessment (LAA)), and the draft 2019 LAA indicates that this has continued and has possibly reduced further (although figures in the 2019 LAA have not been published due to confidentiality issues).
- Policy ENV4 attempts to deal with this issue through a criteria based policy for future extraction, however, paragraph 9.4.2 identifies that no suitable new sites have been identified, so it is possible that no sites will come forward, leading to a future deficit and potential need for additional sand and gravel from other areas, including Cheshire West and Chester. This is particularly important as Greater Manchester is in a similar situation (according to the LAA).
- Going forward, CWAC would suggest that to be effective, this is managed through the North West Aggregate working Party.

Policy MD2

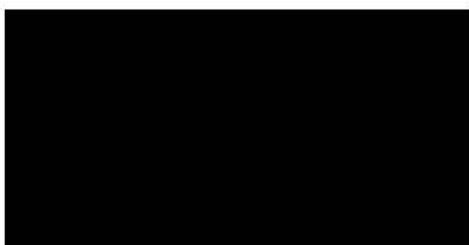
- CWAC supports paragraphs 10.2.12-13 and 10.2.19 which recognise that major infrastructure improvements will be required to J9 and J10 of the M56 and J20 of the M6 early in the plan period and further transport infrastructure will be required to support later phases.
- However, CWAC considers that to be effective, the supporting text should be clarified that this could also include transport infrastructure requirements which are potentially located in neighbouring authority areas.
- Furthermore, CWAC suggests that to be effective, criterion 15 of the policy, which states that new employment development will not be permitted until funding for improvements at J9 of the M56 and J20 of the M6 has been agreed, should be widened to also include J10 of the M56 and to apply to the residential elements of the site.
- For clarity and to be effective, criterion 16 should be amended to be more specific as to which phases of residential development, or what timeframe 'later' in the plan period refers to.
- CWAC supports the inclusion of criterion 55(f) which refers to improvements to J9 and J10 of the M56 and J20 of the M6.
- With regard to the supporting document '*Transport Model Testing of the WBC Proposed Submission Version Local Plan and Highway Schemes in the Infrastructure Delivery Plan (March 2019)*' that has informed the Warrington's Proposed Submission Version Local Plan, CWAC would make the following comments:
 - While it is noted that the model considered three scenarios, it is also noted that the full size of the Warrington Garden suburb of 7,400 homes has not been tested as 2,300 are outside the plan period, and none of the scenarios appear to cover the Strategic Road Network.

- CWAC would like to seek confirmation that CWAC's Local Plan allocation and commitment development data has been used within the model, especially data surrounding Northwich and the Ellesmere Port Enterprise Zone, linking back to the M56. Along with allocations from neighbouring Halton, Cheshire East and Manchester Airport proposals.
- For information, the modelling data from the Northwich Transport SATURN Model can be shared with Warrington Borough Council upon request. In addition all development data, commitments and allocations are available to be shared, including Winnington Urban Village (for example) in Northwich. It should further be noted that Highways England's SATURN Model includes CWAC Local Plan data and for consistency it is suggested that the Warrington model does the same.
- The modelled scenarios assume that M6 and M56 smart motorway and J11a capacity improvements (identified under RIS 1) are implemented. However, CWAC is concerned that if these corridor enhancements do not come forward – what impact would the Local Plan have on existing congestion – as these future improvements (potential smart motorway extension) are dependent on the outcome of future RIS allocations.
- The sustainable transport links to the wider urban areas need to be reviewed (rather than just how the proposed allocations connect back to Warrington Town Centre), for example, Northwich and Manchester Airport. This would also apply to connections back to rail stations, where CWAC is concerned that traffic may displace to Frodsham, due to lower fares (as compared to Warrington and Runcorn East) and free parking when travelling into Chester and North Wales (no analysis appears to have been conducted on this, within the multi-modal traffic model on utilising existing rail assets).
- What sensitivity testing had been conducted on trip rates, as only two types of trip rates appear to have been used for the whole allocations (one for residential and one for employment)? Sharing of a sensitivity test report is necessary to understand the impact of different threshold rates.

I would like to highlight that this is an Officer view only. I trust that the comments are helpful and we would welcome the opportunity to continue our joint working through the finalisation of our Statement of Common Ground in due course.

If you require any further explanation please contact me.

Yours sincerely



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Cheshire West and Chester Council