

14<sup>th</sup> June 2019

Michael Bell  
Planning Policy and Programmes Manager  
Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
WA1 2NH

Dear Mr Bell,

## **CONSULTATION ON WARRINGTON BOROUGH COUNCIL'S PROPOSED SUBMISSION VERSION LOCAL PLAN**

Thank you for consulting and inviting comments from Manchester Airport on your Proposed Submission Version Local Plan. As a major business, transport facility and economic hub within the region we welcome the opportunity to respond. Our comments are set out under the relevant headers below.

### Introduction and Warrington in Context

The spatial portrait of the borough is usefully described, and we note that strategic location and strong economic performance are cited as key strengths. The link between connectivity and economic growth is extremely important and we welcome the acknowledgement that is made to this when discussing Warrington's contribution to the North West economy. We agree that many of the opportunities for the borough arise from having a location at the heart of the North West Region and the wider links that are available via road, rail, waterways and air. We are pleased that reference has been made to Manchester Airport being within easy reach (note that the word International can be deleted from the Airport's title) but the Plan then lacks any further detail or consideration of the value of this.

Manchester Airport serves as the primary global gateway for the North of England. It is the UK's 3rd largest passenger airport (the largest outside of London) and 4th largest cargo airport. Annual passenger throughput is currently at 28.8 million and more than 70 airlines operate a mix of full service, charter and low-cost services to over 200 destinations worldwide. Manchester Airport therefore provides crucial links and access to international markets, offering frequent daily links to a wide range of destinations in Europe, the United States, the Middle East and the Far East. Generating some £918m in GVA to the UK economy, Manchester Airport is a substantial economic hub and is recognised as a key driver of economic growth and activity across the whole of the North of England.

Olympic House  
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With the addition of rail, bus, coach and tram facilities, Manchester Airport is also a major regional transport hub and public transport interchange. This connectivity and rapid international access are of immense value to the borough's residents and businesses, and are important influencing factors in attracting new investment to the Region.

Airport City and the wider Greater Manchester Enterprise Zone also offers a highly connected business destination that includes office, advanced manufacturing and logistics facilities in a prime location adjacent to Manchester Airport. This development provides further opportunities to stimulate economic growth and for employment that will be of benefit to the wider Region.

Given the economic advantages and connectivity that close proximity to Manchester Airport affords, it is important to acknowledge this in the Local Plan and ensure that a suitable policy framework is in place to enable Warrington to benefit from and contribute to this economic potential. The value of enhanced connectivity to the Airport along the M56, and direct rail links to the Airport, should also be promoted. Following the similar comments that we made in response to the Preferred Development Option consultation it is disappointing that the beneficial impact of Manchester Airport has not been evidenced.

With reference to Figure 2 – Warrington in the Region, we feel that a key would be useful to more clearly identify the various features that are shown on the map, including the Atlantic Gateway and to distinguish between the roads and rail routes, as well as some additional labels to identify the major roads such as the M6 and M56.

### Vision and Objectives

We welcome the Vision that has been set out, particularly in relation to the infrastructure improvements that will support new jobs, homes and businesses, the development of major new employment locations, enhancing strategic connectivity and transforming the public transport system. In relation to point 4, there is no doubt that Warrington's strategic location adjacent to the conurbations of Greater Manchester and Liverpool and proximity to key transport networks are of great economic benefit and it will be important to capitalise on these to maximise economic growth. We therefore welcome measures that will improve accessibility across the Borough and to key destinations in the wider Region. We would encourage you to build upon these cross-boundary opportunities as the overall vision for the borough cannot be developed in isolation from these.

We are supportive of the range of Objectives as a means to deliver the overall Vision for the borough, particularly W1, W3 and W4 with their focus on delivering growth with appropriate investment in infrastructure, services and sustainable travel that will support this. Supporting transport measures and improved accessibility will be an important means of securing the desired economic growth and competitiveness. As discussed above and referred to in our response to the Preferred Development Option Consultation, consideration of the role that Manchester Airport plays within the Local Plan would offer a foundation for economic growth.

### Plan Spatial Strategy

The inclusion of Figure 3 – Local Plan Key Diagram is useful to illustrate the proposed spatial strategy but would benefit from some labels on the map, for example road names.

We are particularly interested in the new Garden Suburb development area at the junction of the M6 and M56 that has been allocated for the delivery of 7400 homes and a major new employment site. This site already has excellent locational advantages adjacent to the strategic motorway network and we welcome the proposed transport schemes and road infrastructure improvements to this site that will facilitate the development. The convenient access that is available to Manchester Airport could usefully be included amongst the benefits of this site.

Maximising connectivity from the other new allocated employment sites at Port Warrington, Waterfront Business Hub and Omega Westward extension will have the same benefits and should also be promoted.

### Strategic Planning Policies

We support the continued economic growth of the borough and recognise that Warrington's location at the heart of the North West Region and excellent transport links are of attraction to many businesses. The proximity to Manchester Airport is a further influencing factor that should be recognised in the Plan.

In relation to Objective W4, we agree that good transport links are fundamental to a successful economy; they are essential to the delivery of sustainable development and for facilitating and enhancing economic growth and competitiveness. We thereby support the inclusion of Policy INF1 – Sustainable Travel and Transport as a means to support the delivery of Objective W4.

We welcome schemes to improve the connectivity, efficiency and sustainability of transport networks both within the borough and to key destinations and major external economic drivers within the adjacent conurbations, such as Manchester Airport. As mentioned earlier, Manchester Airport is a major transport hub and international gateway, playing a major role in boosting the North West's connectivity and meeting the economic and social needs of the Region. Ensuring that there are effective transport links and improved accessibility between Manchester Airport and the borough is therefore important and we feel that Manchester Airport should be identified within the Plan as an important destination for access improvements.

### Site Allocations

As mentioned earlier in our response, we are particularly interested in the allocation of the Warrington Garden Suburb and associated Policy MD2. Given the scale of the urban extension, types of infrastructure, facilities and services, and landscape framework that are being proposed in close proximity to Manchester Airport, we would appreciate being included in any future discussions surrounding the preparation of site masterplans and the Supplementary Planning Document that is to be prepared for the site.

Accessibility and transport links to the Garden Suburb will be fundamental to its success and we are supportive of the comprehensive package of significant highways and public transport improvements that will support the development of this site. As mentioned earlier in our

response, occupying a location at a major intersection between the M6 and M56 motorways is of real advantage enabling convenient connectivity to the Region and beyond. We are keen to be involved in any consultation regarding the implementation of new transport measures, including any mitigation measures that are required to offset any impact of traffic generated by the new employment site.

The direct access to Manchester Airport from the Garden Suburb along the M56 is a major advantage when attracting businesses to the employment area and we recommend that this be promoted within the Plan. The potential for aviation and airport related development should also be considered at this site. Given the number of jobs provided directly at the Airport, it would also be beneficial to consider the relationship between the future populous of the Garden Suburb and Manchester Airport in terms of employment provision and public transport accessibility.

### Other Matters

We are concerned that the Plan fails to address, or include a policy, related to Aerodrome Safeguarding. We advised of the requirement for this in our previous response to the Preferred Development Option Consultation and this advice still stands. By virtue of its importance to the national air traffic system Manchester Airport is an officially safeguarded aerodrome and parts of its safeguarded area fall within the borough. This may influence the type of development allowed in certain areas. In order to determine the safety implications of a proposal there is an established safeguarding process between local planning authorities and safeguarded aerodromes.

Legislative provisions regarding the process of Aerodrome Safeguarding are set out in the Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 (ODPM Circular 1/2003) and local planning authorities within Manchester Airport's safeguarded area are obliged to consult the Airport on planning applications for developments that have the potential to impact the safe operation of aircraft or that may prejudice the Airport's future development.

Safeguarding maps are issued to Local Planning Authorities by the CAA and these show the extent of the safeguarded area and set out the requirements for statutory consultation with the Airport. For Warrington this includes all buildings, structures, erections or works exceeding 90m in height, any proposal within 13km of the aerodrome with the potential to attract birds (e.g. significant areas of landscaping, water bodies, nature reserves, bird sanctuaries, waste facilities, sewage works, mineral extraction or quarrying), all proposals connected with an aviation use within 13km of the aerodrome, and all applications for wind turbines throughout the whole of the borough.

Warrington Borough Council must therefore, before granting planning permission for a development of land falling within the criteria indicated on the Safeguarding Map, consult the Airport as Statutory Consultee to the planning process. It is therefore essential to have an appropriate and robust policy relating to aerodrome safeguarding within your Local Plan to ensure that aviation interests are protected. We recommend the following wording –  
“Development that would adversely affect the operational integrity or safety of Manchester

Airport or Manchester Radar will not be permitted". This should be accompanied by an explanation of why the policy is required.

An Aerodrome Safeguarding related development management policy would also link to policies DC3 – Green Infrastructure, DC4 – Ecological Network, ENV1 – Waste Management, ENV6 – Restoration and Aftercare of Mineral and Waste Sites and ENV7 – Renewable and Low Carbon Energy Developments.

Thank you again for providing us with the opportunity to comment on the Proposed Submission Version of your Local Plan. We hope that our comments have been useful but please do not hesitate to contact us if you have any queries or wish to discuss any of the points made in more detail.

Yours sincerely,



Natalie Belford  
**Planner**