



St. Helens Council

Local Plan,
Planning Policy and Programmes,
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Local Plan
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Town Hall
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Tel: 01744 [REDACTED]

14 June 2019

Dear Sir or Madam,

Warrington Proposed Submission Version Local Plan 2017-2037

I refer to your e-mail dated 15 April 2019, in which you notified St Helens Council of the publication of the Warrington Proposed Submission Version Local Plan 2017-2037 ("the Plan"). I would be pleased if you would treat this letter as the formal response of St Helens Council to the consultation.

St Helens Council supports the overall strategy of the Plan, which builds upon the history of cooperative working between our two Councils on strategic issues such as housing, employment, river catchment management, transport and Green Belts. We do however have a number of comments relating to various policies, which are set out in the table which accompanies this letter. We would be grateful if these could be considered as the Plan progresses through its next stages.

Please do not hesitate to contact me if you require any further details.

Yours Sincerely,

[REDACTED]

Jonathan Clarke

Development Plans Manager

WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN 2019

RESPONSE OF ST HELENS COUNCIL

Chapter/Policy/Paragraph number	Response of St Helens Council	Reasons
Chapters 2 and 3	St Helens Council supports the way the spatial issues are identified in chapter 2, and the strategy which is set out in chapter 3.	The strategy appears to be well reasoned and robust.
Paragraph 3.3.21	St Helens Council supports the references to the 'Omega Westward Extension' in paragraph 3.3.21.	<p>Paragraph 3.3.21 refers to land at Omega Westward Extension in St Helens being made available to count towards Warrington's employment land needs. This approach is consistent with the discussions that officers of our two Councils have undertaken via the 'duty to cooperate' and with the St Helens Borough Local Plan: Submission Draft (January 2019), which includes this area as a site allocation for employment uses.</p> <p>We request however that further consideration be given to how the accessibility of the Omega area in general could be improved for St Helens residents (see our later comments on transport issues).</p>
Paragraph 3.4.6	Support this paragraph.	St Helens Council agrees that it is not able to accommodate any of Warrington's housing development needs. It also supports the reference to the Omega Westward Extension – see above.
Policy DEV 1 'Housing Delivery'	St Helens Council supports the housing need and delivery figures set out in Policy DEV1, and the other provisions set out in this Policy.	<p>The Mid Mersey Strategic Housing Market Assessment 2016 identifies that St Helens, Warrington and Halton form a single 'housing market area'. The approach of the Plan to this topic is therefore of significant interest to St Helens Council.</p> <p>We note that the Plan identifies an Objectively Assessed Need (OAN) of 945 dwellings per annum (dpa) and that this represents a modest uplift of just 4% above the figure of 909 dwellings derived using the Government's standard method. We also note that the Plan proposes a stepped</p>

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		<p>approach to delivery, with 847 new homes to be completed on average each year between 2017 and 2021, and 978 each year between 2022 and 2037. Whilst it is possible that the employment figures which underpin the 4% uplift could be affected by future changes in commuting patterns between our two Boroughs (see our comment on Policy DEV4 below), we consider the housing need and delivery figures are justified in the Plan and its evidence base. The approach set out is also consistent with the extensive discussions that officers from our two Councils have undertaken under the 'duty to cooperate'.</p>
<p>Policy DEV4 – Economic Growth and Development – clause 1</p>	<p>St Helens Council does not object to the employment target of 362 hectares in Policy DEV1, subject to it being kept regularly under review as the Plan progresses.</p>	<p>We note that the Plan requires provision to be made for at least 362 hectares of land to be developed for employment uses (within Classes B1, B2 and B8) from 2017 until 2037.</p> <p>We also note that Warrington's assessment of its future employment land need is, like that used in St Helens, based on past uptake. St Helens Council does not object to this approach. However, St Helens Council is also keen to improve its own employment land offer, particularly for Class B8 logistics uses for which the take up in recent years has been reduced by restrictions on land supply in St Helens Borough. By increasing the supply of suitable employment land available in St Helens, and meeting our full need for new employment land within St Helens Borough itself, we aim to provide more jobs for residents of the Borough and reduce the existing high levels of out-commuting. This could affect the longer term distribution of need between the two Boroughs. For this reason, we would request that the target figure of 362 hectares be kept regularly under review as the Plan period progresses.</p>
<p>Policy DEV4 – Economic Growth and Development – clause 3a)</p>	<p>St Helens Council supports the reference to Omega as a primary location for industrial, warehousing, distribution development and other B</p>	<p>Given its proximity to St Helens (and subject to our comments about the need to improve transport links between St Helens and Omega set out later) the identification of Omega as a primary location for continued employment growth is likely to provide substantial continued employment</p>

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	Class Uses in clause 3a) of Policy DEV4.	opportunities and related benefits to St Helens residents. The reference to Omega is therefore supported.
Policy DEV4 – Economic Growth and Development – supporting text, paragraphs 4.2.14 and 4.2.16	St Helens Council supports the references to the ‘St Helens Omega Extension’ in paragraphs 4.2.14 and 4.2.16.	The references to land located in St Helens (at Omega) being made available to count towards Warrington’s employment land needs are consistent with the discussions that officers of our two Councils have undertaken via the ‘duty to cooperate’. They are also consistent with the St Helens Borough Local Plan: Submission Draft (January 2019), which includes this area as a site allocation for employment uses.
Policy GB1 – Green Belt	St Helens Council acknowledges the evidenced need to review Green Belt boundaries in Warrington and supports the provisions of Policy GB1.	St Helens Council notes that the Plan, whilst continuing the previous commitment to regenerate urban areas and brownfield sites, also includes a substantive review of Green Belt boundaries to allow future development needs to be fully met. This approach is in line with that being undertaken by St Helens in its own emerging Local Plan and is supported.
Policy TC1 – Town Centre and surrounding area	St Helens Council supports the provisions of Policy TC1 and its supporting text, particularly the emphasis on refocussing retail and other town centre development within Warrington Town Centre as set out in paragraph 6.1.21.	We note that (in paragraph 6.1.21) the Plan stresses the need to refocus retail and other town centre uses within Warrington town centre (as opposed to out-of-centre locations). This approach is welcomed.
Policy INF1 – Sustainable Travel and Transport – clause 1 ‘general transport principles’	Support the policy in general but request that the following amendments (or other amendments with similar effect) be made: <ul style="list-style-type: none"> • clause 1a) be amended to read ‘...be located in sustainable 	St Helens Council broadly supports the transport policies in the Plan. It also agrees that (as stated in paragraph 7.1.2 of the Plan) there is a critical need to address the dependency on the private car and increase the use of public transport, walking and cycling. In this context we would welcome greater emphasis on the provision of sustainable transport linkages between the urban areas of St Helens (and its other constituent key settlements such as Newton-le-Willows and Rainhill and the proposed Garden Suburb at Bold) and the urban areas and employment

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	<p><i>and accessible locations, or in locations that can be made sustainable and accessible, from other parts of Warrington and nearby Boroughs'</i></p> <ul style="list-style-type: none"> • clause 2 be amended by the addition of an additional bullet to read: <i>'...provide for improved walking and cycling linkages from neighbouring Boroughs where needed'</i> • clause 3 be amended by the addition of an additional bullet to read: <i>'...provide for improved public transport linkages from neighbouring Boroughs where needed'</i> 	<p>sites in Warrington (e.g. at Omega). At present there are barriers to movement – including by walking, cycling and public transport – between some of these areas.</p> <p>The amendments proposed are intended to address this point.</p>
Policy INF1 – Sustainable Travel and Transport – clause 1i)	Support clause 1i)	St Helens Council agrees that pressure on the motorway and local road system is a key issue affecting Warrington and its surrounding areas (including St Helens). We therefore strongly support the requirement in clause 1i) of Policy INF1 for new development to consider the impacts on the wider region's Strategic Road Network. It will be important for our respective Councils to continue the existing cooperative working to address this issue.
Policy INF1 – Sustainable Travel and Transport – clause 5	St Helens Council suggests that the following be inserted into clause 5 of Policy INF1 <i>'d. support the provision of</i>	St Helens Council supports the emphasis on improving freight transport provision set out in clause 5 of Policy INF1. However, we request that this part of the Policy should refer to the opportunity presented to develop

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	<p><u><i>a Strategic Rail Freight Interchange or other rail enabled employment uses at Parkside.</i></u></p> <p>We also request that the supporting text to Policy INF1 should refer to the opportunity for rail enabled employment uses presented by Parkside.</p>	<p>a Strategic Rail Freight Interchange at Parkside. This represents a unique opportunity to help meet the acknowledged need (set out in the National Policy Statement for National Network's 2015 and in the Transport for the North's Freight and Logistics Report 2016) for the development of further rail connected multi-modal distribution parks. Alternatively the site would be suitable for the development of other rail enabled employment uses. Whilst the Parkside site lies just across the border in St Helens Borough, its development will require consideration of highways and other infrastructure needs in Warrington.</p>
Policy DC3 – Green Infrastructure	<p>Support the references to Sankey Valley Park and St Helens Canal</p> <p>Also support clause 3 of the policy, which refers to wider programmes which seek to connect Warrington's Strategic Green Infrastructure with communities, employment areas and other green infrastructure assets both within and outside the Borough.</p> <p>Support the reference to Bold Forest Park in clause 3b)</p>	<p>This policy recognises the importance of a suitably joined up approach to managing Strategic Green Infrastructure.</p>
Policy ENV1 – Waste Management	<p>Request that on-going liaison takes place to ensure any cross boundary waste issues affecting St Helens are adequately addressed in this policy.</p>	<p>The Merseyside and Halton Joint Waste Local Plan 2013 was prepared by the 5 Merseyside local authorities and Halton Council. It will be necessary for the needs assessment underpinning Policy ENV1 to adequately dovetail with the monitoring of the Joint Waste Local Plan.</p>
Chapter 10 – Main Development Areas and Site Allocations	<p>St Helens Council is broadly supportive of the site allocations set out in this chapter, subject to the point of detail raised below regarding Policy OS1 – Burtonwood.</p>	<p>The site selection process appears to have been robustly justified.</p>

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Policy OS1 – Burtonwood	St Helens Council has no objections to the proposed allocation of land for 160 homes at Burtonwood. However, it requests that consideration be given to amending clause 14 of Policy OS1 to require the development to <i>'...make a contribution towards the delivery of improved cycle links to employment opportunities at Omega/North Warrington <u>and in St Helens</u>'</i> .	The site in Burtonwood is close to employment areas at Bold and in Newton le Willows (both of which are in St Helens Borough) and it would be beneficial if the policy gives wider consideration to the cycle network in this area.