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Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017

2: Questions

Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

Response:

Please see attached representation

Question 2

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

Response:

Please see attached representation

Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

Response:

Please see attached representation

Question 4

Do you agree with the new Local Plan Objectives?

Response:

Please see attached representation

Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

Response:

Please see attached representation

Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

Response:

Please see attached representation

Question 7

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

Response:

Please see attached representation

Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

Response:

Please see attached representation

Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

Response:

Please see attached representation

Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

Response:

Please see attached representation

Question 11

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

Response:

Please see attached representation

Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

Response:

Please see attached representation

Question 13

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

Response:

Please see attached representation

Question 14

Do you agree with our approach to providing new employment land?

Response:

Please see attached representation

Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

Response:

Please see attached representation

Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

Response:

Please see attached representation

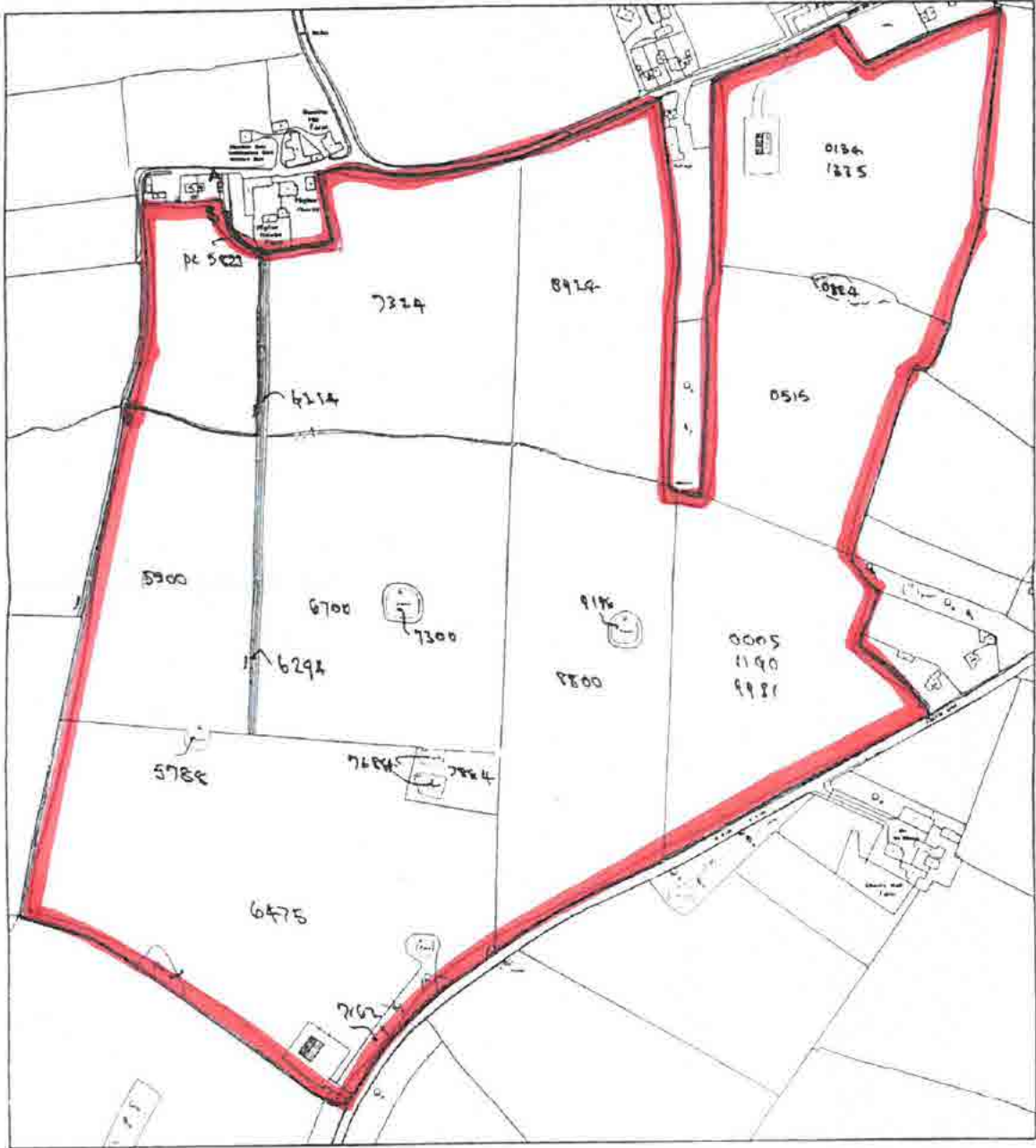
Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

Response:

Please see attached representation

WA13 OSY



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MARSHALL
CHARTERED SURVEYORS
Northway, Chorley

Booths Lane / Cherry Lane
Lymm

Location Plan

Scale: [Redacted]
Date: [Redacted]



DE POL

CHARTERED TOWN PLANNERS

INCORPORATED 1933

WARRINGTON BOROUGH COUNCIL LOCAL PLAN PREFERRED OPTIONS

CONSULTATION RESPONSE

REPRESENTATIONS ON BEHALF [REDACTED]

Description:

Representations to the Warrington Borough Council emerging local plan Preferred Options consultation (Sept 2017).

Site Location:

Land south-west of Lymm

On behalf of:

[REDACTED]

Date:

September 2017



1. INTRODUCTION

- 1.1. This representation statement is submitted on behalf of [REDACTED] who are the owner of land known as Cherry Hall Farm situated west of Cherry Lane and south of Booths Lane, Lymm, Warrington, WA13 0SY. The purpose of the document is to respond to the Council's recently published Local Plan Preferred Options draft emerging planning policy.
- 1.2. This report undertakes a brief evaluation of the main policy requirements relating to development plan preparation before highlighting areas which ought to be further considered to ensure soundness of the plan moving forward. It also concludes that more detailed consideration and examination of windfall figures, strategic implications /duty to co-operate. As a result, consideration should be given to allocating more sites and in different areas of the borough for development of new smaller urban villages so as to ensure delivery of housing in the plan period.
- 1.3. We support the need to release green belt land in Warrington to enable the housing requirement to be delivered. However, in line with NPPF 14, it is essential that enough land is allocated to provide sufficient flexibility to ensure that the housing requirement is delivered. This is particularly pertinent given the limited capacity to meet development requirements without green belt release.
- 1.4. This statement concludes by making reference to areas land situated south west of Lymm which is immediately available for residential-led redevelopment along with complimentary services and appropriate upgrades to infrastructure.

2. CONSIDERATION OF SOUNDNESS

- 2.1. We consider that amendments to the emerging plan are required to ensure that it is sound; positively prepared; justified and effective as per paragraph 182 of the NPPF.
- 2.2. Development Plans should aim to ensure a sufficient supply of housing can be delivered to meet identified needs and encourage sustainable growth. There is a clear national policy objective to boost significantly the supply of housing and NPPF 14 confirms that Local Plans should be able to meet objectively assessed needs with sufficient flexibility to adapt to rapid change.
- 2.3. To ensure plans are deliverable, including a mixture of small and medium sized sites which are immediately available is considered to be necessary.



Description of the policy framework

2.4. The overarching planning policy framework is set out in the National Planning Policy Framework (NPPF), the main relevant paragraphs are as follows:

- 2.4.1. NPPF paragraph 14 states sustainable development should be seen as a golden thread running through both plan-making and decision-taking, confirming that for plan making this means that Local Plans should meet the objectively assessed needs.
- 2.4.2. Paragraph 17 of the identifies one of the core planning principles of the planning system, which it states should underpin both plan-making and decision-taking, is to proactively drive and support sustainable development to deliver the homes that the country needs, with every effort made objectively to identify and then meet these needs.
- 2.4.3. NPPF paragraph 47 requires local planning authorities (LPA) to “*boost significantly*” the supply of housing by, inter alia, using their evidence base “*to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing*”.
- 2.4.4. Paragraph 152 also confirms that Local Plans should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and deliver net gains across all three. Paragraph 7 highlights that the economic role includes contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. It also confirms that providing housing to meet the needs of present and future generations is a key social role of sustainability.
- 2.4.5. The NPPF also acknowledges the key role of delivering adequate housing in this regard, with paragraph 21 stating that planning policies should recognise and seek to address potential barriers to investment such as a lack of housing.
- 2.4.6. The NPPG confirms “*robust, up to date evidence to support the deliverability of sites*” to ensure that judgements on deliverability are clearly and transparently set out. To be “*achievable*” PPG para. 021 (ref ID: 3-021-20140306) confirms that there needs to be a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. at ID:3-035-20140306 that “*Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.*”



Housing need and supply

- 2.5. The draft strategy identifies a housing requirement of 1,113 dwellings per annum over the plan period. This housing requirement will be met through Strategic Sites allocated in combination with the authority's existing supply as set out in its SHLAA (2017). There is a stated capacity for 15,429 homes within the urban area which results in a shortfall of land for 8,8791 dwellings and therefore a need to release enough land for 8,791 new homes over the plan period 2017-2037.
- 2.6. It is identified that the existing supply figure, identified above, has been derived from the SHLAA and includes all existing sites with planning permission and those within the urban area may come forward but do not currently have planning permission. The existing supply position was a key factor in establishing the amount and location of land to be allocated elsewhere.
- 2.7. It is considered unlikely that all of the sites identified within the existing supply figure of 15,429 will not be delivered during the plan period, if at all. In this setting it would not be advisable for an authority to utilise this figure without doing more detailed testing to confirm that it is realistic for the site to be developed. In relation to the SHLAA and Urban Capacity Study it is important to consider the following:
- They are not policy documents and only identify sites that have 'potential' for residential development. It cannot be assumed that just because a site is identified in the SHLAA it is by definition suitable for housing development and would be granted planning permission because there may be site specific factors or other environmental constraints which rule it out;
 - Not all land identified within a SHLAA will be deliverable / viable. There will be deliverability or viability constraints affecting some of the sites identified in the document;
 - It is not uncommon for sites identified in SHLAAs to not be brought forward for development by landowners, or for sites to be developed for alternative non-residential uses.
- 2.8. Ultimately it is highly unlikely that all of the SHLAA sites will come forward for development over the plan period. As such, the number of SHLAA sites identified may not be delivered as suggested and there is a requirement to identify more sites to ensure there is sufficient available land.
- 2.9. In summary, more detailed scrutiny of the identified SHLAA sites is required to ensure that the emerging plan is robust and that the Council's housing targets can be delivered.



Windfall allowances

2.10. The Council's housing land supply includes an 87 dwelling per annum allowance from small windfall sites (of less than 0.25ha in size). This figure is an average of 87 dwellings being completed per annum on small sites over the last 10 years and the Council therefore proposes to carry this figure forward into its housing land supply. This figure is derived from taking a simple arithmetic average by dividing the number of completions over the number of years.

2.11. Under the terms of NPPF para 48, local planning authorities may only make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites will continue to provide a reliable source of supply. The figure should be robust and well evidenced.

2.12. On this point it is important to note two main criticisms:

2.12.1. The figure is calculated based on an arithmetic average. Whereas the modal average for completions (the number of completions which occurred most often) during the 10-year period was 57 dpa and the median average (middle) was 60 dpa, both of which are materially lower than the figure presented by the Council. Additionally, unusually higher figures are apparent and have the effect of skewing the calculations, notably the highest number of small sites completions (207) was in 2007/2008 during a year when 1,565 completions occurred; compared to a much lower annual average of 588 (mean avg.) or 305 (median avg.) taken over the rest of the 9 years.

The figures presented are clearly not robust and well evidenced. Moreover, given the likelihood of a lower than stated number of windfall developments coming forward annually, more land needs to be allocated to ensure housing delivery targets are met.

2.12.2. There has been no up-to-date adopted development plan for some years this is likely to have artificially inflated the number of sites coming forward which are labelled as 'windfall' simply because they were not approved in the context of an adopted Plan.

2.13. It is suggested that there have been a larger than number of small windfall sites approved over the proceeding ten-year period than would be expected if there was an adopted plan in place. Additionally, the figure taken is too high as a result of being artificially inflated by the completions in 2007/08. In this context we submit that the windfall delivery rate is not a robust means of forecasting realistic windfall delivery going forward and therefore the stated figure for windfall discounted from the available land supply figure.



Duty to co-operate

2.14. The Planning Acts require that the Council properly undertake its duty to co-operate by working effectively with other local planning authorities on strategic matters. Whilst the Council suggests it has held meetings with neighbouring authorities, it states at 2.37 (pg. 9) that “no significant issues were raised” and yet there is no mention at all of the Greater Manchester Combined Authority (GMCA) area and its emerging strategic and spatial strategies.

2.15. Our client is concerned that a number of key strategic GMCA ambitions have not been properly considered. Whilst Warrington is not part of the GMCA area, there are numerous specific links with at least four of the strategic sites to be delivered through the Greater Manchester Spatial Framework (GMSF). In particular, there are large allocations proposed for new development at the north and east edges of the WBC area but WBC preferred options strategy does not appear to take these implications and aspirations (and HS2 more widely) into account.

For example (see overleaf for location plan):

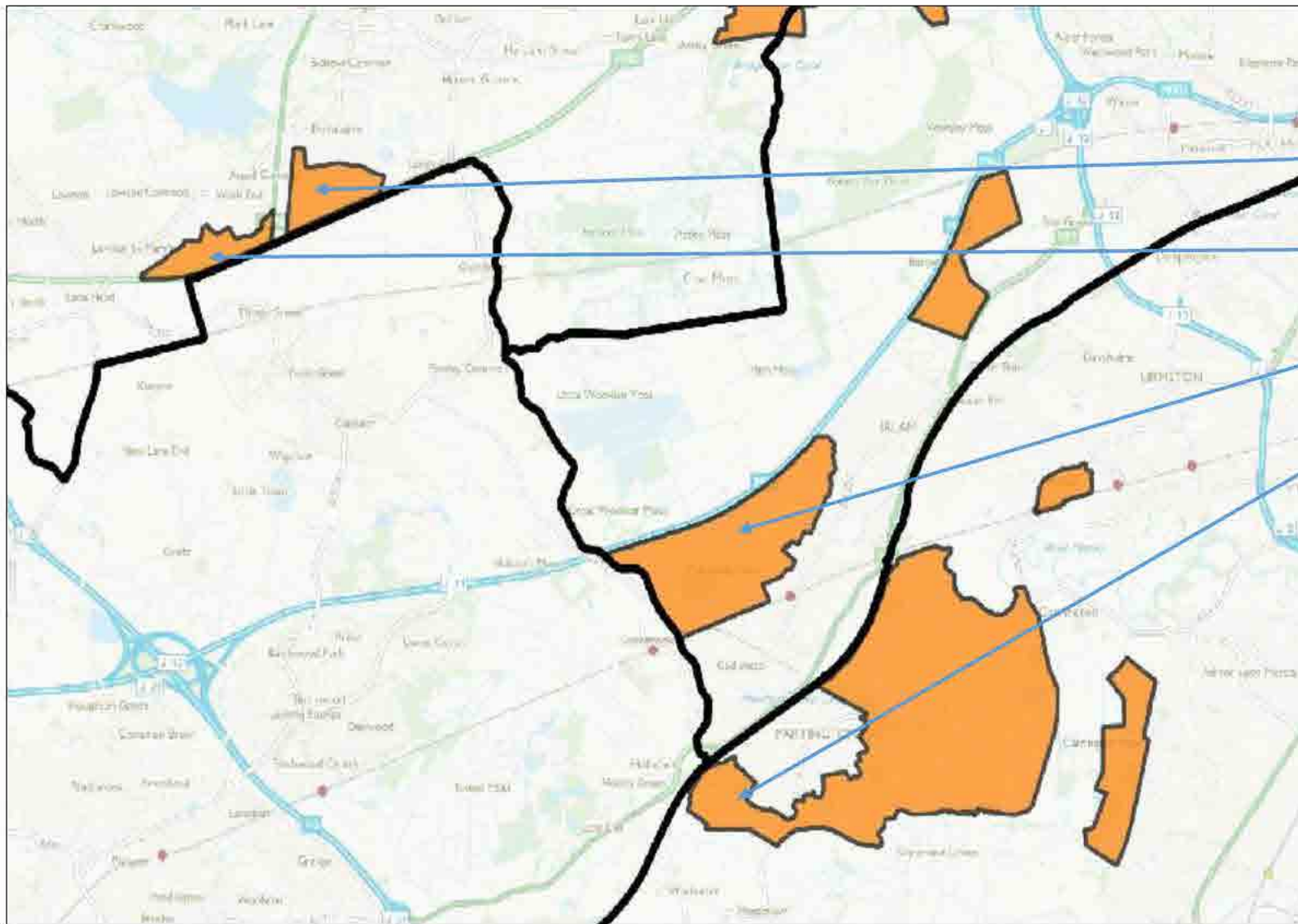
WG1 (New Carrington) - situated south of the Manchester Ship Canal and immediately adjacent to the Borough boundary proposes 750,000 sqm of employment land with new job creation promises. It is situated only 4.6km from Lymm with easy road access via Heatley and Warburton Rd.

WG2 (Cadishead and Irlam) - situated south of the M62 and immediately abutting the WBC eastern borough boundary proposes 2,250 new homes by 2035, with supporting facilities. This allocation has a direct connection into Warrington Town and Birchwood Park via the A57.

ELR3 (Pocket Nook) - situated north of the A580 East Lancs Road, which forms the boundary between Wigan and Warrington borough areas, this proposed allocation proposes 133,000 sq. M of B1, B2 and B8 floorspace together with safeguarded land for the HS2 railway.

ELR4 (South Pennington) - situated north of the A580 promotes housing and employment land.

2.16. We consider that there has been insufficient detailed consideration of how these proposed GMSF allocations (which all border the WBC and include substantial housing and employment land allocations) will influence the locational need for housing and business growth in east and north Warrington. It is questioned whether the preferred option spatial strategy for the Borough adequately takes into account the wider growth ambitions in the Greater Manchester region as a result of pending devolution of planning and infrastructure powers to the GMCA.

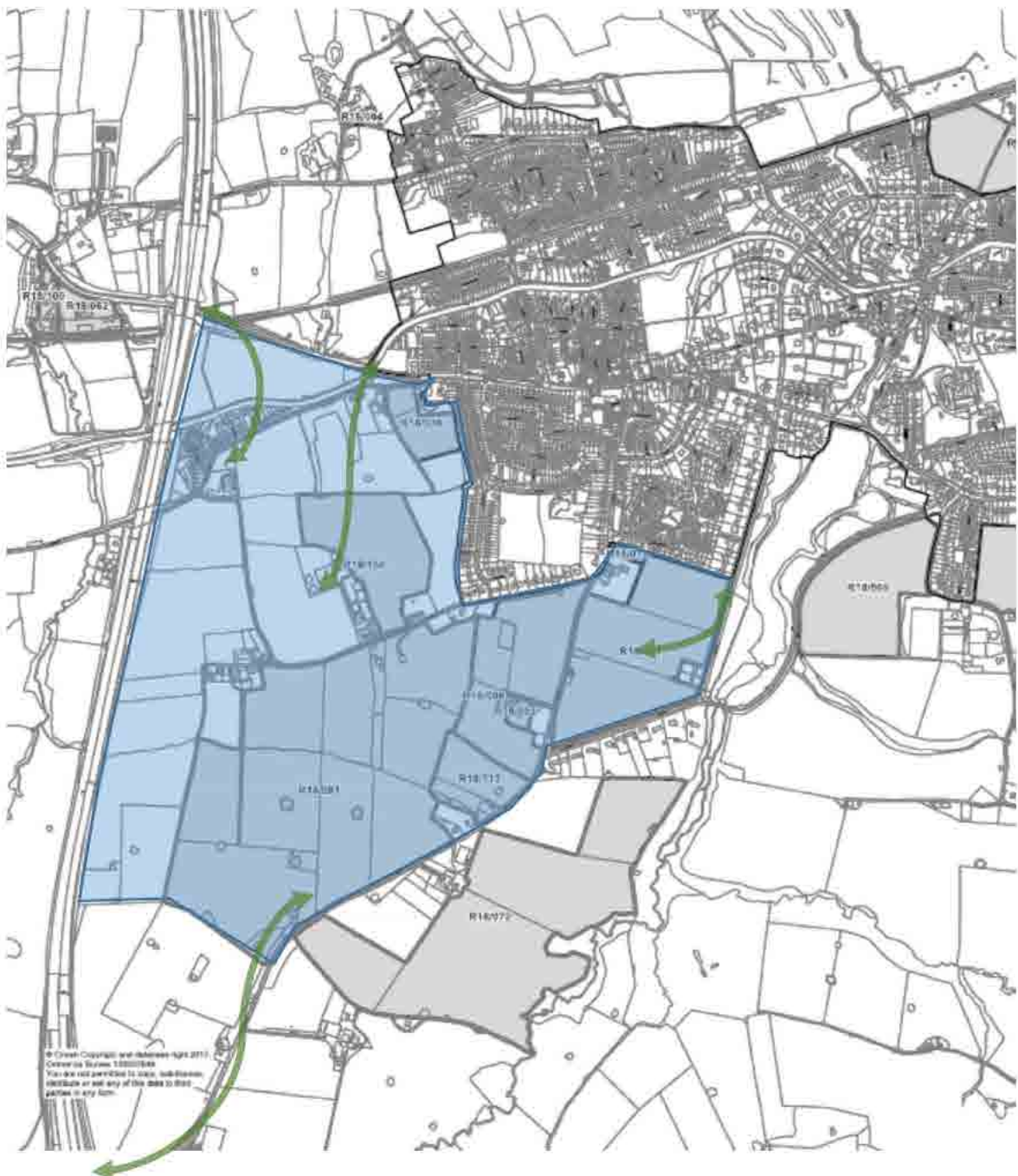


- PROPOSED DRAFT GMSF ALLOCATIONS (2017)**
- ELR4 (South Pennington)
 - ELR3 (Pocket Nook)
 - WG2 (Cadishead And Irlam)
 - WG1 (New Carrington)

3. ALTERNATIVE SITES AVAILABLE

- 3.1. As described above, a mixture of sites and even sites in alternative locations could be considered. This could include proposing an urban village development in an alternative location which may include the land surrounding Lymm which can be distinguished from the remainder of the HMA.
- 3.2. The site measures approx. 142ha and could accommodate dwellings and mixed uses. It is envisaged the site would be brought forward based on a comprehensive development master-planned basis.

Fig. 1. Potential alternative allocation on the edge of Lymm:





Justification

- 3.3. Paragraph 52 of NPPF confirms that extensions to existing settlements can best achieve a supply of new homes, stating that local authorities should consider this approach to provide the best way of achieving sustainable development.
- 3.4. In this case, the Council has to deliver its housing need and has judged that settlement extensions are an appropriate method of achieving its housing requirements. There is good reason why this similar approach could be taken in other locations in the authority area to give a wider choice to developers of various sizes in order to kick-start the Warrington Means Business growth strategy and to meet identified housing needs.
- 3.5. Whilst existing facilities in Lymm could continue to serve the population, supplementing and enhancing this provision would be essential. To this extent, a mixture of complementary facilities could be provided on site, including school places and local services to meet increased demand and appropriately worded legal agreements would be entered into to achieve it.
- 3.6. Additionally, the affordable housing target for the area is considerable. Due to its higher than average values when compared to the rest of the HMA, an appropriately prepared scheme south of Lymm may allow these higher values to include a higher proportion of affordable housing, which is a wider community benefit. This in turn could complement existing housing supply and increase diversity of available housing in this part of the Borough and the HMA.
- 3.7. One of the matters raised is that delivery of a large-scale site can stall or be delivered at a slower rate of progress than initially expected, resulting in a shortfall in supply. In the event that this site is not considered favourable for allocation during this plan period, consideration should be given to safeguarding the site so as to ensure that the Council can meet its housing needs at later dates.

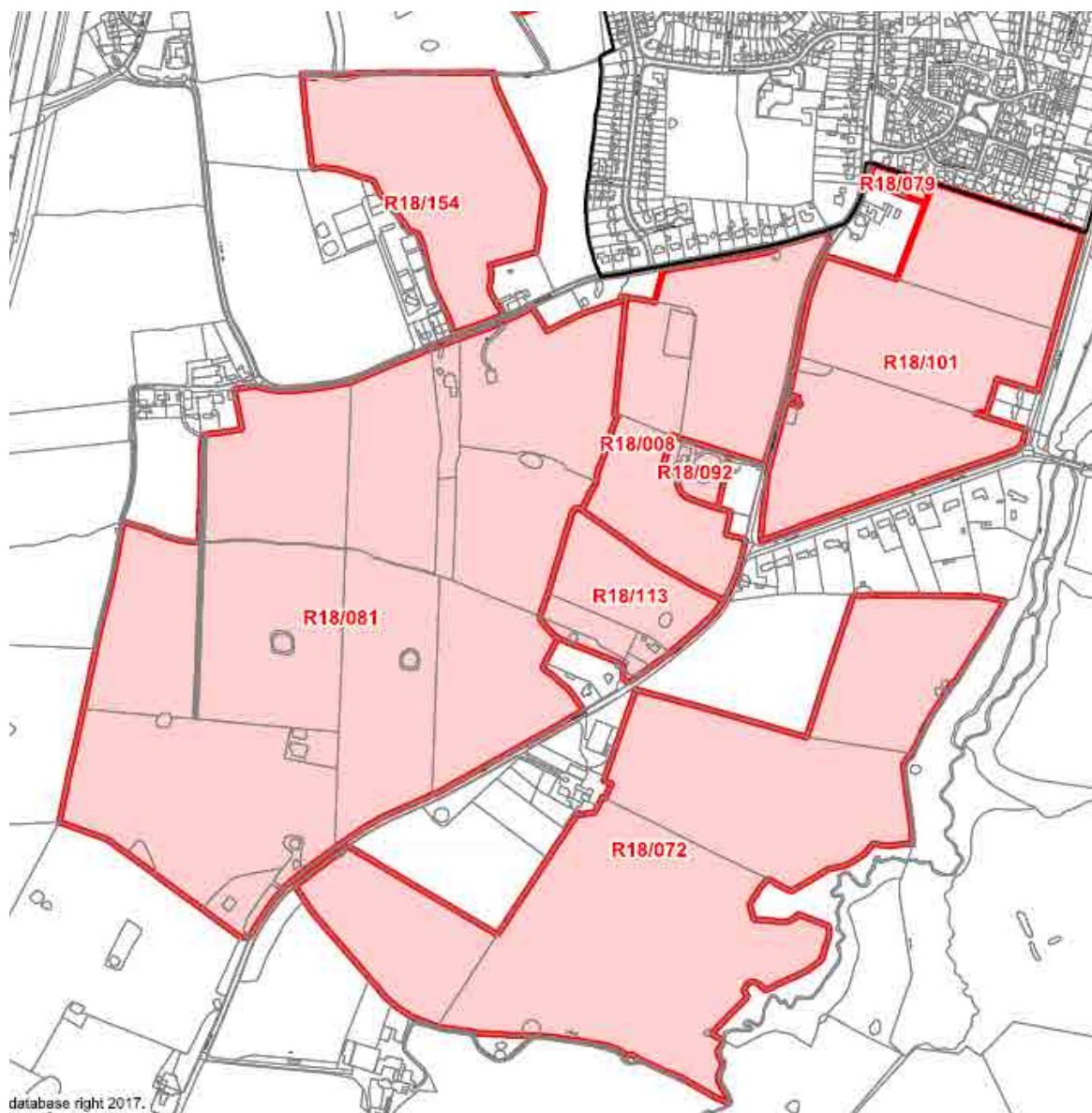
Access

- 3.8. The site benefits from ready access to Junction 20 of the M6 motorway via to the west and Junction 9 of the M56 motorway to the south via the B5158 Cherry Lane. Additionally, the area around Lymm and the proposed site allocation benefit from good permeability via access points at the A56 Stockport Road and Statham. Locationally the site is well positioned within commuter distance from Warrington, Cheshire and the wider Cheshire and Mersey region.



4. GREENBELT REVIEW

- 4.1. The Council has undertaken a review of its greenbelt (Arup, Greenbelt Review 2016) and responded to the sites promoted through the call for sites exercise. For the below stated reasons, we conclude that the scoring of Greenbelt Parcel could be revised.
- 4.2. Our client's land site is currently within the adopted green belt. However, the Council accepts that greenbelt sites will need to be released to meet housing needs and as such, are undertaking a greenbelt review. The site was assessed under greenbelt parcel ref. R18/081 as making a "strong" contribution to the greenbelt, however, the actual scoring matrix for the site does not bear this out.
- 4.3. This parcel of land is bound by Cherry Lane on the east, Booths Lane on the north and Massey brook at the west. The boundaries of the site shown as assessed:



database right 2017.



4.4. The five greenbelt purposes can be assessed as follows:

4.4.1. 1) Checking the unrestricted sprawl of large built up areas

The site is not adjacent to the Warrington urban area and does not therefore function to prevent urban sprawl.

Score given: No Contribution

Refined Site Score: No Contribution

4.4.2. 2) Prevent neighbouring towns from merging into one another

The appraisal states that the site is not within an essential gap between Lymm and Warrington. Additionally, the M6 motorway would continue to impose a physical and perceived barrier between the site and the town.

Score given: Weak contribution

Refined Site Score: Weak contribution

4.4.3. 3) Assist in safeguarding the countryside from encroachment

The eastern and northern boundaries of the site are within 50m of the urban edge of Lymm and directly opposite a row of dwellings on Booths Lane which has a continued frontage of private residences. Farmsteads and single dwellings are dotted along the eastern edge. The appraisal states that Cherry Lane (B5185) to the east is considered to be a durable boundary and the urban edge of Lymm already exists to the north. As described, it can be argued that the site makes only a moderate contribution to this greenbelt purpose.

Score given: Strong Contribution

Refined Site Score: Moderate contribution.

4.4.4. 4) To preserve the setting and special character of historic towns; and

The site is not within or close to a Conservation Area or historic town.

Score given: No Contribution

Refined Site Score: No contribution



4.4.5. 5) Assist in urban regeneration, by encouraging the recycling of derelict & other urban land.

As noted in the appraisal, the Mid-Mersey Housing Market Area has low capacity for brownfield development and the Council needs to release greenbelt land.

Score given: No Contribution

Refined Site Score: Moderate

4.5. In light of the above, it is arrived that the parcel makes a moderate contribution in two areas, no contribution in two areas and a weak contribution in another. When the applied less dogmatically, a revised scoring as a matter of judgement would be likely conclude that the site, given its proximity to the developed areas of Lymm and built areas within it, makes only a moderate contribution to the greenbelt purposes overall:

PURPOSE	1	2	3	4	5
SCORE GIVEN	None	Strong	None	Moderate	Strong
SUGGESTED SCORE	None	Weak	Moderate	None	Moderate

Summary

4.6. The site benefits from good access to the strategic road networks and could offer an opportunity to a self-sustaining extension to the Lymm urban area. Overall, the land owned by our client makes only a moderate contribution to greenbelt purposes and is immediately available.

4.7. In light of the above, this site may be considered suitable as an alternative allocation.



5. CONCLUSIONS

5.1. The Preferred Options does not adequately take some important considerations into account and in order to be sound, further consideration should be given to the following:

- Addressing the apparent lack of detailed consideration with respect to proposed strategic allocations being promoted through the GMSF process, in particular those which border the borough at the north and eastern borough boundaries;
- The proposed windfall figure is lacking in robust and convincing evidence. Carrying the figure forward without further detailed scrutiny and this would compound the shortfall in delivery during the preceding years.
- Identifying mixture and larger number sites if it is to deliver sufficient housing to meet objectively assessed needs in the plan period;
- Consideration whether the creation of number of new smaller urban villages located in different parts of the borough which could be delivered more effectively and more quickly to meet the identified shortfall in housing delivery.

5.2. There are alternative sites available within the Borough for a comprehensive settlement expansion, an example of such sites is given. The fringes of the site are in a sustainable location with ready access to amenities and facilities and the sustainability of the wider site can be enhanced by making on-site provision and commuted sums to achieve environmental and social benefits.



For further information please ask for:

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