



Representations

on behalf of:

Mulbury Homes (Grappenhall) Ltd

at

**Land at Carr House Farm, Broad Lane,
Grappenhall, Warrington**

June 2019



SATPLAN
PLANNING & DEVELOPMENT

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1. Introduction

- 1.1 These representations have been prepared on behalf of Mulbury Homes (Grappenhall) Ltd in response to the Warrington Submission Version Draft Local Plan (2017-2037).
- 1.2 The representations relate specifically to Land adjacent to and surrounding Carr House Farm, Broad Lane, Grappenhall, Warrington. From this point forward, referred to as 'The Site'. A site location plan is included at Appendix 1.
- 1.3 The Site is being promoted on behalf of the landowners by Mulbury Homes (Grappenhall) Ltd. To date the site has been promoted alongside the emerging Warrington Local Plan for release from the Green Belt to meet future housing requirements.
- 1.4 These representations seek to provide specific comments on the following matters:
 - The overall spatial strategy and general support for the principle of the draft Garden Suburb allocation
 - A review of the Council's evidence base, particularly in relation to the evidence available to justify the proposed location of Country Park within the Warrington Garden Suburb
 - Questions in relation to the acclaimed developer engagement process which is reported to have been undertaken and the need for further information and clarification on delivery mechanisms and land equalisation.
- 1.5 The remainder of this statement is structured as follows:
 - **Section 2 - The Site and Surrounding Area** sets out the characteristics and locational benefits of the Site.
 - **Section 3 – Spatial Strategy & the Warrington Garden Suburb** – Supports the proposed allocation of the Warrington Garden Suburbs but questions the availability of evidence to justify the location of land uses within the area.
 - **Section 4 – Evidence Base and Justification for the Location of the Country Park**– Reviews the content of the Council's Green Belt Assessment, Sustainability



Appraisal and Garden Suburb Development Framework and the justification for the location and extent of the Country Park.

- **Section 5 – Developer Engagement**– Questions the extent of the developer engagement process, the proposed Supplementary Planning Document and future delivery and implementation mechanisms.
- **Section 6 - Summary and Conclusions** - draws out the information presented as part of this submission.



2. Site and Surrounding Area

- 2.1. The Site is located at the southern periphery of Grappenhall, which sits to the south of Warrington town centre. A site location plan is included in Appendix 1.
- 2.2. The site is split into two parcels (referred to as the northern parcel and the southern parcel herein). The northern parcel extends to approximately 11.67 hectares (28.8 acres). It is currently comprised of two arable fields, with hedgerows and scattered hedgerow trees along the northern, southern and western boundaries and to the eastern boundary is a block of woodland. The southern parcel extends to approximately 12.71 hectares (31.41 acres). It is currently comprised of two arable fields, with hedgerows along the boundaries.
- 2.3. Part of the wider Site is also in a commercial use with the sale of Christmas Trees at Carr House farm.
- 2.4. The northern parcel adjoins Grappenhall Hall Residential School to the north. The school buildings are owned by the Department for Education. The school has been closed for a number of years but has future development potential.



3. Spatial Strategy and the Warrington Garden Suburb

- 3.1. The Warrington Proposed Submission Version Local Plan 2017-2037 seeks to direct the majority of development within the existing urban area. The Plan seeks to deliver 945 homes per annum (18,900 homes over the plan period). The majority of new homes will be delivered within the existing main urban area of Warrington, the existing inset settlements and other sites identified in the Council's Strategic Housing Land Availability Assessment (SHLAA), which together have identified deliverable capacity for a minimum of 13,726 new homes.
- 3.2. Warrington's remaining development needs will be met through Green Belt release. Policy DEV1 of the draft plan provides the housing requirement and spatial distribution. Our client strongly supports the identification of the new Garden Suburb to the south east of the main urban area of Warrington as a sustainable urban extension where Green Belt will be released to deliver around 5,000 homes.
- 3.3. Our client also supports the notion that the Garden Suburb will seek to deliver a wide range of infrastructure and services to support the new development in the south Warrington area and that it will be developed as a sustainable urban extension to the south east of the main urban area of Warrington with a strong landscape framework of open spaces and parkland.
- 3.4. However, our clients land holdings have been identified to provide the majority of the Country Park area within the urban extension. On reviewing the published evidence available to support this draft plan, we have very significant concerns in relation to the Council's lack of information and overall approach to deal with equalisation of land values across the Garden Suburb allocation. We also consider that little evidence has been presented by the Council to justify the reasoning as to why our clients land is considered to be the most appropriate location for the park.
- 3.5. This representation goes onto to consider the evidence base available and our questions and concerns in relation to the Council's overall approach to developer engagement to deliver the Garden Suburb successfully.



4. Evidence Base and Justification for the Location of the County Park

Green Belt Assessment October 2016

- 4.1. An initial Green Belt Assessment was undertaken in 2016 to support the Local Plan Preferred Options Consultation. The Study undertook an assessment on the relative performance of the Green Belt, by splitting it into parcels of land and assessing them against the five purposes of the Green Belt as set out in National Policy.
- 4.2. Following this, an assessment of each of the sites submitted by developers was undertaken in July 2017 in relation to the importance and contribution each site makes to Warrington's Green Belt.

Conclusions of Parcel Assessment and Land at Carr House Farm

- 4.3. Our clients site falls within the following parcels and their contribution is detailed below:

Parcel Reference	Parcel Contribution
WR39	Strong
GH3	Weak
GH4	Moderate

Land at Carr House Farm was concluded to contribute to the Green Belt as follows:

Site Reference	Site Contribution
R/18/047(North)	Moderate
R/18/047(South)	Moderate

- 4.4. We do not seek to reiterate or necessarily challenge the conclusions of the Green Belt assessment. On the contrary, we support the overall need for the assessment and the review of the Green Belt is integral to the Local Plan preparation process to identify areas where development can be accommodated without harming the fundamental aims of national Green Belt policy as set out in the NPPF.
- 4.5. However, it is unclear how the conclusions of the Green Belt Assessment for our client's site has translated into the identification of the site for a country park. Whilst



we appreciate that three possible options were considered for its location within the Garden Suburb and a number of factors have influenced the final decision, no reference is made specifically as to how the conclusions of the Green Belt Assessment have led to the final preferred location.

Sustainability Appraisal

4.6. It is acknowledged that the Sustainability Appraisal (SA) seeks to test the high-level spatial options and reasonable alternatives for spatial distribution across the borough. We support the broad conclusions that the majority of development should be located at the edges of the main urban area, particularly with the majority of growth directed within the Garden Suburb where our client’s site sits.

Appraisal of individual sites

4.7 Section 6 of the SA includes the appraisal findings for individual sites. Page 36 includes our client’s site with reference R18/047. The Council has also published site assessment proformas as part of their evidence base (reference R/18/P2/113). We note that there appears to be some discrepancies between the conclusions drawn within the SA and conclusions drawn within the site assessment proforma when exactly the same site boundary has been assessed.

	Sustainability Assessment Conclusion	Site Assessment Proforma Conclusions
NR3 Loss of High Quality Agricultural Land’.		
BNH3 Capacity for landscape to accommodate development whilst respecting its character		

4.8 SA objective NR3 concludes that as the site contains more than 20 hectares of agricultural land class 1-2, the loss of this land to another use is therefore considered to have a *significant negative effect*. The ‘site assessment proforma’ concludes that, *A negative effect is possible*. It is unclear why this objective is assessed and presented differently. The majority of the undeveloped land to the south of Warrington will form



Best and Most Versatile (BMV) and whilst this is a relevant consideration, the overwhelming need for sustainable residential development should outweigh any concern regarding the loss of BMV in this location.

4.9 SA objective BNH3 concludes there would be a *significant negative affect* on the surrounding landscape area whereas the 'site assessment proforma' suggests that *whilst development would alter the landscape character of the site, mitigation measure ought to be possible.*

4.10 The conclusions of the SA site assessment do not provide an overall conclusion to justify or explain why our clients land has been chosen as the most preferable land holding to accommodate the country park.

Appraisal of options for the Garden Suburb

4.11 Section 8 of the SA is particularly concerned with the concept options for the Garden Suburb. Table 8.1 presents the options on where a country park would be located along with other land uses.

4.12 Paragraph 8.2.1 of the SA explains that the masterplan framework for the Garden Suburb sets out the processes that were undertaken prior to a preferred approach being established. The SA does not provide any real conclusion or justification as to why the location of the country park was selected to be Option B, apart from including a statement that "*it would achieve the primary objectives set for the Garden Suburb whilst maintaining the 'Essence of Place' (Para 8.2.4).*" This is a vague conclusion to draw and lacks any detail.

4.13 Appendix 1 within the Sustainability Appraisal also fails to give clear reasons and justification as to how the SA has actually contributed to the appraisal of options for the layout of the Garden Suburb allocation. The text acknowledges that the inclusion of a country park within the Garden Suburb will clearly have a positive overall effect. However, its specific location is still not explained with the exception of the reference to option B ensuring that the location of the park will '*provide a greater amount of landscaping buffering to reduce the potential negative effects on the Scheduled*



Monument within the area. The analysis contained in appendix 1 appears somewhat an afterthought to retro fit the process.

Garden Suburb Development Framework

4.14 The Draft Development Framework prepared by Aecom for the Council provides the draft concept for the Garden Suburb, revolving around the creation of three Garden Villages, a District Centre, Strategic Employment Area and Country Park.

Developer engagement

4.15 We have read and considered the Garden Suburb Development Framework document in detail and have specific comments to make in relation to the evidence presented within it and the developer engagement process which it professes to have occurred.

4.16 Section 4 of the Development Framework provides a summary of stakeholder and developer engagement that was undertaken to inform evolution of a preferred framework for the Warrington Garden Suburb. It makes a number of references to various individual presentations made to developers and interested landowners throughout the evolution of the framework options and subsequent evaluation of the preferred options presentations which have taken place with the major developers and landowners with interests in WGS.

4.17 We do not concur with the general tone of the Development Framework which seeks to justify that developer engagement has been inclusive and in depth. Whilst there has been a greater level of engagement in recent weeks (which is welcomed), there was little engagement earlier on, therefore some matters have not been progressed as far as they could have been had there been earlier more meaningful dialogue at an earlier stage.



Specific comments on Evidence Base & Technical Studies

- Green Belt Assessment: Page 20 of the Development Framework simply reports and illustrates the findings of the green belt site assessment conclusions. No explanation or justification is provided in relation to the proposed location of the country park in green belt terms.
- Environmental Designations: Page 33 and 34 detail existing environmental designations including deciduous woodland areas. The framework notes that the area will seek to retain and enhance woodland wherever possible but no reference to as to how the proposed location of the country park seeks to relate to these environmental designations.

4.18 Overall, the document fails to properly explain why our clients land has been selected as the most appropriate location for the Country Park. The work and conclusions drawn from other evidence base documents appear to have been outlined but not used collectively to justify the rationale for the location of various land uses proposed within the Garden Suburb.

Phasing Strategy

4.19 The Development Framework acknowledges that the growth opportunities represent a significant level of change to the south-east of Warrington and that the timing and delivery trajectory of development and associated infrastructure will be influenced by a number of factors. We support the need for a phasing strategy but do not consider that this has yet been developed fully by engaging with all landowners.

4.20 A statement on page 54 details that *"It is envisaged that the Country Park will be an early delivery objective but phased over time as WGS evolves"*. We do not dispute that a country park should be delivered within the early phases of the Garden Suburb but as our client's land has been identified as a significant land holding which could deliver this element, further and detailed discussions are needed with WBC to progress this. More information is required from WBC as to how and when the Country Park would be delivered as part of the whole vision of the WGS.



Future Engagement

- 4.21 We welcome the 'Next Steps' outlined on page 97 of the Development Framework. Ongoing collaboration between the public sector and landowners is a key to the delivery of the proposed Garden Suburb. Clearly there is a need to for more information relating to infrastructure and delivery requirements and clarity is needed in relation to the proposed approach to Developer Contributions and Land Equalisation.



5. Draft Local Plan Policy MDA2 and proposed Supplementary

Planning Document

5.1 This section of the representation, specifically comments on draft Policy MDA2 within the Local Plan and the suggestion that the final form of development will be determined through the preparation of a comprehensive development framework which the Council will prepare as a Supplementary Planning Document (SPD).

5.2 The supporting text within section 10 details how the delivery of the Warrington Garden Suburb will be ensured. We support the general concept but have particular concerns with regards to its delivery mechanism, time scales and lack of information on land equalisation measures.

Relationship between Policy MDA2.2 and an SPD for the GS

5.3 Firstly, it is unclear of the timing for the development of the SPD.

5.4 It is our view that an SPD should provide additional detail to support a comprehensive adopted policy. At present the policy as drafted defers many of the key delivery specifics to this SPD. This effectively means that key issues and decisions on how to implement and deal with factors such as required infrastructure and land equalisation is being delegated to a later date. For example, criteria 11 of policy MDA 2.2 is drafted in such a way that it defers the critical process of dealing with 'how' a mechanism will be put in place to secure contributions from all developers within the Garden Suburb to the SPD. This deferring tactic could risk the overall delivery of the GS allocation which is not in WBCs interest or the land owners in the area.

5.5 Given the overall size of the Garden Suburb and the multiple land ownerships within it, such detail should be dealt with urgency and in detail ahead of the preparation of an SPD. Much of the matters raised here should be contained with the key policy itself and explanatory text. Other more detailed matters could for a later SPD for the wider area.

5.6 Whilst we welcome maintaining momentum, we have reservations that the production of an SPD cannot progressed until more information is available to our clients relating to infrastructure costs, phasing and the equalisation of land values.



6. Summary and Conclusions

- 6.1. Our client strongly supports the identification of the new Garden Suburb to the south east of the main urban area of Warrington as a sustainable urban extension, acknowledging the need for Green Belt release.

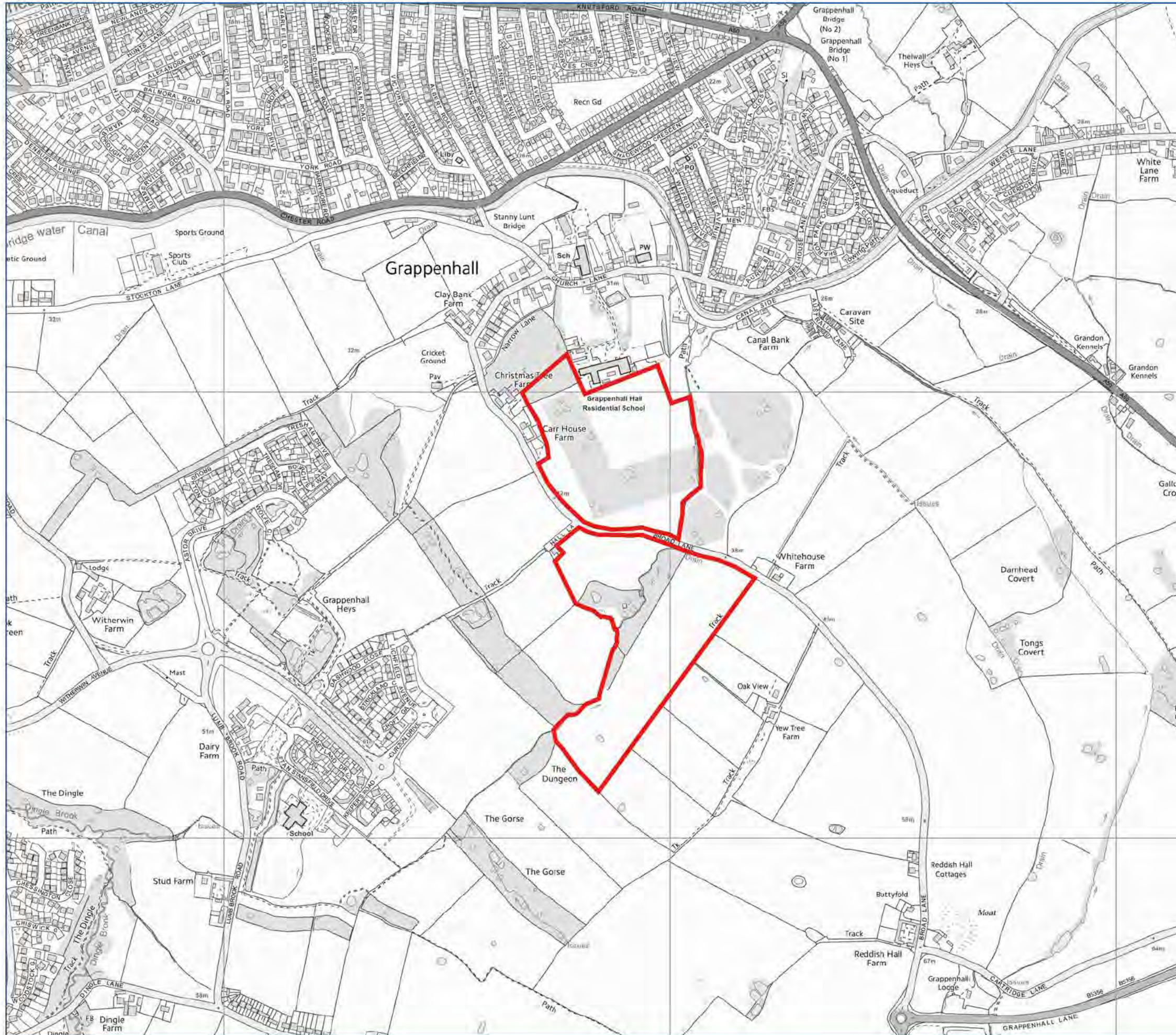
- 6.2. Our clients Site has been identified to provide the majority of the Country Park area within the urban extension. On reviewing the published evidence available to support this draft plan, we have significant concerns in relation to the Council's lack of information and overall approach to deal with equalisation of land values across the Garden Suburb allocation. We also consider that little evidence has been presented by the Council to justify the reasoning as to why our clients land is considered to be the most appropriate location for the park. We have sought independent Counsel advice which reaffirms these observations.

- 6.3. At this juncture, our client objects to the identification of their Site as a Country Park. There is insufficient evidence to support this aspect and there is a lack of detail concerning the equalisation of land values and infrastructure costs associated with the SWGS. We have reservations that the production of an SPD cannot progressed until more information is available to landowners relating to infrastructure costs, phasing and land equalisation – much of which should be addressed within the Local Plan rather than being deferred to an SPD. There is clearly more work to be undertaken to underpin the delivery of the Garden Suburb allocation, not least the identification of infrastructure costs and the mechanism to deal with equalisation of land values. Further information needs to be made available by the Council regarding this and how it may be implemented before the Local Plan can move forward.

- 6.4. All landowners and relevant stakeholders should continue to be included in the local plan process. This will be critical to ensuring the Plan is deliverable. The Site owners would welcome the opportunity for further dialogue with the Council in this regard.



Appendix 1 – Site Location Plan



 Site Boundary



Project Land at Broad Lane, Grappenhall.
 Drawing Title Site Location Plan
 Scale As Shown (Approximate)
 Drawing No. 10728/P07
 Date July 2017
 Checked DE/AL



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