

17 June 2019

Local Plan, Planning Policy and Programmes Warrington Borough Council New Town House Buttermarket Street Warrington WA1 2NH

By post and email: Localplan@warrington.gov.uk

Dear Sir / Madam,

REPRESENTATIONS TO THE WARRINGTON LOCAL PLAN PROPOSED SUBMISSION VERSION: LAND AT THELWALL HEYS, GRAPPENHALL

These representations have been prepared by Avison Young ('AY') on behalf of Liberty Properties ('Liberty') and refer to land controlled by Liberty at Thelwall Heys, Grappenhall, as shown on the red edge plan at Appendix 1 ('the site'). The site does not benefit from an allocation for development within the Warrington Local Plan Proposed Submission Version ('WLPSV') and is therefore proposed to remain within the Green Belt.

Liberty have promoted the site for residential development through the Warrington Local Plan ('WLP') process since early 2017 and have submitted a detailed Development Statement (September 2017), as well as representations to previous rounds of consultation on the WLP.

Liberty have recently commissioned Urbed to prepare a further piece of work to demonstrate the site's sustainability credentials, its suitability for a residential allocation within the WLP and the compelling justification for its inclusion within the Warrington Garden Suburb ('WGS') allocation in spatial planning terms. This document, which can be found at Appendix 2, was subject to a discussion with key Policy Officers at a meeting held at Warrington Council's Offices on 10 June 2019.

The representations made by Liberty to the WLP to date have requested that the site should form part of the WGS allocation (Policy MD2), which is one of the largest allocations in the Local Plan and is anticipated to deliver 5,100 dwellings within the Plan period and 7,400 homes in total. The sites' location adjacent to the existing settlement of Grappenhall would result in its delivery early within the Plan period, as it is physically unconstrained and will not require the implementation of any significant new infrastructure to facilitate its delivery. The site is not included within the WGS allocation within the WLPSV and is therefore proposed to remain within the Green Belt.

These representations provide comments on the strategic policies and objectives contained within the WLPSV in the context of the Thelwall Heys site. Comments are provided on the Council's strategy for the allocation and distribution of residential development and specifically Policy MD2 (Warrington Garden Suburb) which currently abuts the site to the west. They build on those representations previously submitted by AY (previously HOW Planning) on behalf of Liberty, including the 2017 Development Statement and June 2019 Urbed document. These documents together in summary demonstrate that the Thelwall Heys Site:

- i) Is a logical and natural extension to Grappenhall;
- ii) Would not result in unacceptable harm or loss to important natural, built or historic environmental assets and does not have any identified constraints that would prevent it coming forward early in the plan period;

- iii) Is sustainable and accessible, with access to key existing and future services and facilities;
- iv) Is wholly available, achievable and suitable to accommodate new development in accordance with the NPPF;
- v) Could deliver approximately of 360 high quality new homes at an appropriate density; and
- vi) Can deliver an attractive network of green infrastructure and greenspace that will benefit future occupiers of the site and the wider community.

Meeting Housing Needs

The Planning Practice Guidance ("PPG") in relation to Housing Need Assessment was revised in July 2018, again in September 2018 and most recently in February 2019. The revised PPG (paragraph 4) sets out the standard methodology for assessing housing need. Paragraph 214 of the National Planning Policy Framework ("NPPF") (2019) states that any plans submitted after the 24 January 2019 should be based on the 2019 version of the NPPF including the standard methodology. WBC will be submitting their Local Plan for EiP later in 2020 therefore the revised framework applies.

At a national level, the NPPF supports the Government's objective to significantly boost housing supply and seeks to ensure that all local planning authorities ("LPA") plan positively for their objectively assessed needs ("OAN") (paragraph 11). To support this objective, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without delay.

Paragraph 2 of the PPG states that 'the standard method uses a formula to identify the minimum number of homes expected to be planned for'. Paragraph 10 advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

Draft Policy DEV1 – Housing Delivery

Draft Objective W1 of the WLPSV sets out a clear, immediate and critical need for housing Warrington and identifies a net minimum requirement for 18,900 new dwellings over a 20-year delivery period (2017 – 2037), equivalent to 945 dwellings per annum. Draft Policy DEV1 ('Housing Delivery') sets out the trajectory as to how the housing requirement will be delivered:

- 2017 2021 (first 5 years) 847 homes per annum; and
- 2022 2037 (following 15 years) 978 homes per annum.

The target of 945 homes per annum over the Plan period has been established through the LPA's Local Housing Needs Assessment (2019) and is approximately 4% higher than the minimum requirement set by the Government's Standard Housing Methodology (using the 2014 based household projections). In view of WBC's commitment to working with the Local Enterprise Partnership ("LEP") to deliver the Strategic, Economic Plan which constitutes a growth strategy.

The WLPSV acknowledges the need to release Green Belt land and the lead in times for the major infrastructure required to deliver the Waterfront, Garden Suburb and South West Extension, which will result in a lower level of housing delivered in the first 5 years of the Plan period. Draft Policy DEV1 identifies two sustainable urban extensions ("SUE's") to be removed from the Green belt. WGS has a minimum capacity of 6,490 new homes, of which a minimum of 4,201 homes will be delivered in the Plan period. This is in addition to the 930 homes within the allocation which already have consent and are included in the capacity of the existing urban area.

A large proportion of homes to be delivered within the Plan period are proposed within these large sustainable extension sites such as the WGS. Although some short-term delivery can be expected, these larger sites tend to take several years to begin delivering significant numbers due to the infrastructure required to facilitate this. Policy MD2 – Warrington Garden Suburb in particular will require developers to jointly prepare a Development Framework for the Garden Suburb as a whole and individual Masterplans for each of the three villages and Neighbourhood Centre. This means that sites

in the most accessible and sustainable locations are required in these locations in order to guarantee that a proportion of these housing numbers can be delivered early within the Plan period, once the initial Masterplanning process is complete. This site is such a site.

Warrington's Case for Green Belt Release

Chapter 13 of the NPPF relates to Green Belt and states that 'once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans' (paragraph 136).

Paragraph 37 states that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonably options for meeting its identified need for development. This will be assessed through the examination of its strategic policies. This will be assessed through the examination of its strategic policies. This will be assessed through the which will take into account the preceding paragraph (136), and whether the strategy:

- A) Makes as much use as possible of suitable brownfield sites and underutilised land; WBC has undertaken significant masterplanning work to unlock significant additional urban capacity over and above that identified in the Council's Brownfield Register and SHLAA.
- B) Optimises the density of development in line with the policies in chapter 11 of the Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; WBC has reviewed its density assumptions for the Town Centre and Inner Warrington and is reviewing residential parking standards, recognising the potential; for high density development in these locations. The Council is proposing minimum density requirements for the Town Centre, together with minimum requirements for all site allocations to minimise the amount of Green Belt release required.
- C) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground - WBC has confirmed that no neighbouring authorities are able to meet any of Warrington's housing development needs. It is also apparent that all of Warrington's neighbouring authorities are having to release Green Belt themselves to meet their own development needs.

WBC has therefore demonstrated that in order to meet its development needs exceptional circumstances exist for Green Belt release. The Plan's proposed housing requirement will ensure that sufficient homes are provided to support the planned level of economic growth, but this can only be achieved with the release of Green Belt land. In view of the above and despite maximising the capacity of the existing urban area, if Warrington is to meet its housing requirement, it can only do so through the release of Green Belt land to provide for approximately 7,000 new homes, equating to approximately 11% of the total area of Green Belt.

Liberty strongly agree with WBC that exceptional circumstances to justify the release of Green belt land for development exist, in line with paragraph 136 of the NPPF. However, we re-emphasise that the Plan still heavily relies on the delivery of housing within the existing urban area, the existing inset settlements and any other additional sites. Given the environmental issues and significant remediation works that these types of sites can often be subject to and issues around land ownership and assembly, we suggest that of the 13,726 new homes proposed on brownfield land it is likely that not all will be capable of being delivered within the plan period or at all. In light of this WBC should be seeking to allocate additional Green Belt for housing to ensure that the requirements of OBJ1 and DEV1 can be met.

Location of Green Belt Release

Policy GB1 sets out the Council's strategy for the retention and release of Green Belt land for development. The policy notes that land at WGS amongst others will be removed from the Green Belt and that within these settlements, 'new build development, conversions and redevelopment proposals will be allowed providing they comply with national planning policy, other relevant Local Plan policies and any relevant Supplementary Planning Documents'.

Liberty strongly supports the proposed removal of land at WGS from the Green Belt, as this will facilitate the residential development of an appropriate and highly sustainably location, which has capacity to accommodate major new development and infrastructure within the Plan period. The release of the WGS site from the Green Belt fully aligns with Objective 2 of the WLPSV, which is to ensure Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.

The Green Belt Assessment undertaken by Arup in 2016 forms a key part of the Local Plan evidence base. The GBA divides the Boroughs Green Belt land up in to parcels, assessing each against the 5 purposes of the Green Belt set out at Paragraph 134 of the NPPF in order to ensure Green Belt release across the Borough will have minimum impact upon the 5 purposes of the Green Belt. The 2016 GBA considered that the site (reference WR35) made an overall 'weak' contribution towards the Green Belt, concluding that:

'The parcel makes a moderate contribution to two purposes, a weak contribution to two, and no contribution to one. In line with the methodology, the parcel has been judged to make a weak overall contribution. The parcel supports a moderate degree of openness and there are durable boundaries between the parcel and the built-up area and the parcel and the countryside, thus it makes a moderate contribution to safeguarding the countryside from encroachment. Development of the parcel could be seen as rounding off the settlement pattern and given the durable boundaries, the parcel makes a weak contribution to checking unrestricted sprawl. The parcel makes a weak contribution to preserving the setting and special character of historic towns¹.'

The development of the Thelwall Heys site would therefore have minimal encroachment and impact upon the five purposes of Green Belt; the site is a self-contained parcel with strong natural boundaries to all sides, which would limit any further future encroachment into the Green Belt. The site should therefore be considered for Green Belt release as part of Policy GB1 and included within the WGS allocation, where it will deliver high quality housing in a sustainable location early within the Plan period.

Policy MD2: Warrington Garden Suburb

Liberty is supportive of Policy MD2 in principle and the variety of land uses which is proposes. It allocates land for a major new mixed-use development within the Plan period and beyond within a sustainable location and will create a new green infrastructure network to enhance the natural environment which will be beneficial to existing residents living within the locality. The development of the WGS will also provide new key infrastructure such as a new primary school, secondary school, recycling centre, neighbourhood centre, local centres and a country park, which will be facilitated and funded predominately by developer contributions within the WGS.

Criteria 53 of Policy MD2 states that 'the Green Belt boundary to the south of the Garden Suburb is defined by the M56 and to the east predominantly by the A50 (Knutsford Road).' Liberty object to the defining of Green Belt boundary as the A50 Knutsford Road. The enclosed Urbed document demonstrates that the release of Green Belt land to the east of the A50 adjacent to the existing urban area of Grappenhall is a suitable and logical location for development. As this land has been assessed as making a 'weak' contribution towards the Green Belt within the 2016 GBA, it is illogical both in locational and Green Belt terms that the A50 should form the boundary of the WGS allocation. Liberty

¹ 2016 Warrington Green Belt Assessment, page H30

therefore request that Criteria 53 is amended to remove reference to the A50 Knutsford Road as the eastern boundary of the WGS.

Liberty is supportive of the Council's proposals to Masterplan the WGS in partnership with Developers and to secure funding mechanisms for key infrastructure before any further residential development can take place. The criterion at MDA 2.2 sets out in detail the process which will be followed to create a Development Framework SPD for the WGS, building on the Illustrative Development Concept set out on page 188 within the WLPSV. This appraach will ensure an appropriate spatial and phasing strategy is agreed for the development of the allocation. If the Thelwall Heys site were to be included within the WGS then Liberty would work alongside the Council to participate in this Masterplanning process and would provide commitment to funding the infrastructure set out at Criterion 14 of Policy MD2.

Although the Masterplanning of the site will secure the future of its comprehensive development, it is important that the WLP considers the time implications for preparing such documents. This process can often take 12-18 months, after which time planning applications which are in line with the approved Masterplan can be submitted. Although there is already some consented development at the WGS which will form part of the first phase of development, there may be a requirement for additional residential development within the first 5 years of the plan to account for previous under delivery and to provide essential funding for future phases of the WGS. Such development should be planned for within sustainable locations such as the Thelwall Heys site which already have key infrastructure in place and access to existing services and facilities.

Vision for The Thelwall Heys Site

Liberty would seek to deliver an integrated, desirable, high quality residential development which meets the needs of the local community at Thelwall Heys. It is envisaged that a scheme which retains and enhances the existing landscape as part of a comprehensive landscape framework with strong connections to the existing form and vernacular of the village could be achieved. The proposals illustrated within the Development Statement respect and embrace the existing canal, forming a high-quality edge to the town whilst creating a softer transition to the rural landscape. The residential development proposals will act as a catalyst to delivering a thriving and diverse economy, providing an enjoyable place to live. The development proposals at Thelwall Heys will deliver new high-quality market and affordable family homes to the benefit of the local community.

The delivery of approximately 360 new homes at the Thelwall Heys site early in the Plan period would provide a valuable and much needed contribution to the Boroughs housing land supply and would shore up any immediate shortfall to delivery from other land parcels within Phase 1 of the WGS development. As the site is under one land ownership and no land assembly is required, the development proposals could come forward under one planning application, providing the Council with further certainty around the short-term delivery of suitable housing land. Furthermore, the financial contributions associated with the planning application could be used to facilitate the delivery of the key infrastructure required to unlock the future phases of development potential and an ability to contribute to the Boroughs short term housing need. If the site were to be removed from the Green Belt and allocated for residential development in the WLP, the site is within the shortest possible timescales which would ultimately contribute to the Borough's five-year housing land supply and deliver highly anticipated new homes early in the Plan period.

Summary

In summary, these representations have been prepared to accompany the enclosed Urbed document and are submitted to the consultation of the WLPSV. They provide comments on the key policies of the WLPSV in the context of the Thelwall Heys site. Liberty strongly believe that the site should be released from the Green Belt and included within the Warrington Garden Suburb allocation (Policy MD2), as it is a logical and sustainable site which would be able to meet the relevant key objectives of Policy MD2 and provide high quality development on land adjacent to the existing settlement of Grappenhall.

We would be most grateful if you could confirm safe receipt of these representations. Liberty are committed to working collaboratively with the Council to bring this site forward for the allocation for housing and subsequently the release from the Green Belt. Should you require any further information then please do not hesitate to contact me.

Yours sincerely



Richard Woodford Principal/Senior Director

For and on behalf of GVA Grimley Limited t/a Avison Young 360



Our Ref: 04B902944/PG/AH

13 June 2019

Norfolk House 7 Norfolk Street Manchester M2 1DW

avisonyoung.co.uk

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

Dear Sir/Madam,

Consultation on the Warrington Proposed Submission Version Local Plan: Comments on Behalf of Liberty Properties in Relation to Land off **Barleycastle Lane, Appleton ('**Schofield/Stafford Site 1**'**)

We are writing to you in response to the current Proposed Submission Version Local Plan consultation exercise on behalf of our client, Liberty Properties, in relation to an area of land off Barleycastle Lane in Appleton located between Barleycastle Farm and Tan House Farm ('Schofield/Stafford Site 1'). A plan of the site, which is approximately 6.6 hectares in size, is enclosed with this letter.

The site falls within a wider area in the south eastern part of the Borough that the Draft Plan is proposing to release from the Green Belt, to develop the Warrington Garden Suburb as a sustainable urban extension which would include around 7,400 homes, 116 hectares of employment land, a central Neighbourhood Centre and an extensive green infrastructure network of open spaces and parkland.

Details of the Garden Suburb Employment Area allocation are set out under Draft Policy DEV4 (Economic Growth and Development). The Policy states that the Garden Suburb site, including the land off Barleycastle Lane, will be removed from the Green Belt and allocated as a new 116-hectare Employment Area in order to help provide sufficient land to meet Warrington's employment land requirement. The Draft Policy goes on to identify the Garden Suburb Employment Area as a preferred location for major warehousing and distribution developments.

As stated previously within the representations submitted in response to the initial 'Call for Sites' exercise in December 2016 and the Preferred Options consultation in September 2017, Liberty Properties fully supports the release of this site from the Green Belt for new employment development.

Appleton is located very close to the key motorway intersection between the M56 and the M6 and the site is located within easy access of Junction 20 of the M6, which provides it with excellent highways connectivity. It is a very well-established employment area which is occupied by a number of major national companies.

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Regulated by RICS

There are no known environmental constraints to the development of the site. It is classified as being at low risk of flooding (falling entirely within Flood Zone 1), it does not fall within an Air Quality Management Area and is not located close to any Local Wildlife Sites, Special Areas of Conservation or Sites of Special Scientific Interest. The land is not known to contain any significant areas of contamination.

The site is in one ownership and the owner is fully supportive of Liberty Properties' proposal to bring it forward for development. Liberty Properties has a track record established over more than 25 years in creating high quality strategic employment development schemes. The company is Cheshire-based and has experience of developing extensively throughout the Borough of Warrington.

Overall, Liberty Properties fully supports the Council's ambitions for economic growth within Warrington that are set out within the Proposed Submission Version Local Plan and agrees that there is a clear need for land to be released from the Green Belt to enable the Borough to consolidate its position as one of the most important economic hubs in the UK. The release of the land off Barleycastle Lane from the Green Belt to accommodate new employment development would deliver significant economic benefits and assist Warrington in realising these ambitions.

We would be grateful if these comments could be given full consideration by the Council kindly request that we are kept updated on the future stages of the Plan-making process.

If you have any queries or require any further information regarding this site in the meantime, please do not hesitate to contact me.

Yours faithfully

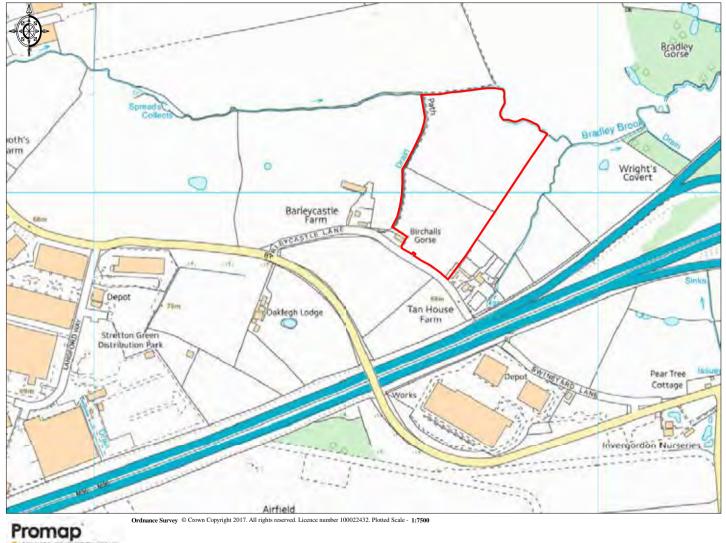


Philip Grant Associate

For and on behalf of GVA Grimley Limited t/a Avison Young

Cc: Phillip Morris – Liberty Properties

Enc: Site Plan





Our Ref: 04B902944/PG/AH

13 June 2019

Norfolk House 7 Norfolk Street Manchester M2 1DW

avisonyoung.co.uk

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

Dear Sir/Madam,

Consultation on the Warrington Proposed Submission Version Local Plan: Comments on Behalf of Liberty Properties in Relation to Land off **Barleycastle Lane, Appleton ('**Schofield/Stafford Site 2'**)**

We are writing to you in response to the current Proposed Submission Version Local Plan consultation exercise on behalf of our client, Liberty Properties, in relation to an area of land off Barleycastle Lane in Appleton located between Barleycastle Farm and the M56 Motorway ('Schofield/Stafford Site 2'). A plan of the site, which is approximately 4.5 hectares in size, is enclosed with this letter.

The site falls within a wider area in the south eastern part of the Borough that the Draft Plan is proposing to release from the Green Belt, to develop the Warrington Garden Suburb as a sustainable urban extension which would include around 7,400 homes, 116 hectares of employment land, a central Neighbourhood Centre and an extensive green infrastructure network of open spaces and parkland.

Details of the Garden Suburb Employment Area allocation are set out under Draft Policy DEV4 (Economic Growth and Development). The Policy states that the Garden Suburb site, including the land off Barleycastle Lane, will be removed from the Green Belt and allocated as a new 116-hectare Employment Area in order to help provide sufficient land to meet Warrington's employment land requirement. The Draft Policy goes on to identify the Garden Suburb Employment Area as a preferred location for major warehousing and distribution developments.

As stated previously within the representations submitted in response to the initial 'Call for Sites' exercise in December 2016 and the Preferred Options consultation in September 2017, Liberty Properties fully supports the release of this site from the Green Belt for new employment development.

Appleton is located very close to the key motorway intersection between the M56 and the M6 and the site is located within easy access of Junction 20 of the M6, which provides it with excellent highways connectivity. It is a very well-established employment area which is occupied by a number of major national companies.

Avison Young is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

There are no known environmental constraints to the development of the site. It is classified as being at low risk of flooding (falling entirely within Flood Zone 1), it does not fall within an Air Quality Management Area and is not located close to any Local Wildlife Sites, Special Areas of Conservation or Sites of Special Scientific Interest. The land is not known to contain any significant areas of contamination.

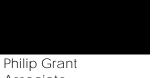
The site is in one ownership and the owner is fully supportive of Liberty Properties' proposal to bring it forward for development. Liberty Properties has a track record established over more than 25 years in creating high quality strategic employment development schemes. The company is Cheshire-based and has experience of developing extensively throughout the Borough of Warrington.

Overall, Liberty Properties fully supports the Council's ambitions for economic growth within Warrington that are set out within the Proposed Submission Version Local Plan and agrees that there is a clear need for land to be released from the Green Belt to enable the Borough to consolidate its position as one of the most important economic hubs in the UK. The release of the land off Barleycastle Lane from the Green Belt to accommodate new employment development would deliver significant economic benefits and assist Warrington in realising these ambitions.

We would be grateful if these comments could be given full consideration by the Council kindly request that we are kept updated on the future stages of the Plan-making process.

If you have any queries or require any further information regarding this site in the meantime, please do not hesitate to contact me.

Yours faithfully

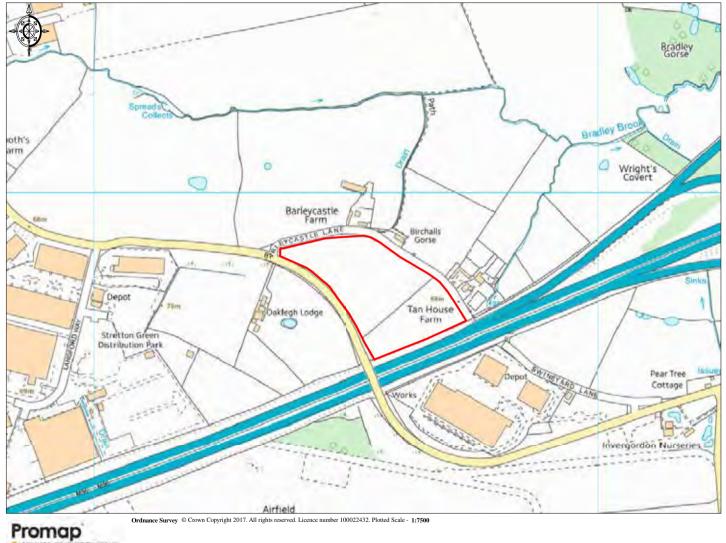


Associate

For and on behalf of GVA Grimley Limited t/a Avison Young

Cc: Phillip Morris – Liberty Properties

Enc: Site Plan





Our Ref: 04B902944/PG/AH

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avisonyoung.co.uk

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By email to: localplan@warrington.gov.uk

Dear Sir/Madam,

Consultation on the Warrington Proposed Submission Version Local Plan: Comments on Behalf of Liberty Properties in Relation to Land off **Barleycastle Lane, Appleton ('Swift Site')**

We are writing to you in response to the current Proposed Submission Version Local Plan consultation exercise on behalf of our client, Liberty Properties, in relation to an area of land off Barleycastle Lane in Appleton ('Swift Site').

The site is bounded to the north by Bradley Brook, to the south by Barleycastle Lane and to the east by a field boundary. Appleton Thorn Trading Estate is located immediately beyond Bradley Brook to the north west of the site and Stretton Green Trading Estate is located to the south west. A plan of the site, which is approximately 15.7 hectares in size, is enclosed with this letter.

Liberty Properties is currently working alongside Eddie Stobart, one of the UK's leading companies in the logistics and supply chain sector (and a major existing employer in the local economy), to address a specific requirement to construct a new National Distribution Centre on this site.

A planning application to deliver this development was submitted to Warrington Borough Council on 6th December 2017 (application ref. 2017/31757). The application was recommended for approval by Council **Planning Officers but refused by the Council's Development** Management Committee at the meeting held on 7th November 2018. A fresh application was subsequently submitted on 1st April 2019 (application ref. 2019/34739) which is currently pending determination. This fresh application incorporates a number of alterations which increase the benefits that would be delivered by the proposed development.

The land off Barleycastle Lane falls within a wider area in the south eastern part of the Borough that the Draft Plan is proposing to release from the Green Belt, to develop the Warrington Garden Suburb as a sustainable urban extension which would include around 7,400 homes, 116 hectares of employment land, a central Neighbourhood Centre and an extensive green infrastructure network of open spaces and parkland.

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Details of the Garden Suburb Employment Area allocation are set out under Draft Policy DEV4 (Economic Growth and Development). The Policy states that the Garden Suburb site, including the land off Barleycastle Lane, will be removed from the Green Belt and allocated as a new 116-hectare Employment Area in order to help provide sufficient land to meet Warrington's employment land requirement. The Draft Policy goes on to identify the Garden Suburb Employment Area as a preferred location for major warehousing and distribution developments.

Liberty Properties fully supports the proposed release of the land off Barleycastle Lane from the Green Belt for allocation as part of the new Employment Area within the Garden Suburb. The site represents the only realistic location capable of accommodating the National Distribution Centre that is required by Eddie Stobart to enable the future growth of the business. Eddie Stobart is a unique, and often overlooked asset for the local economy in Warrington and the proposed development is a highly deliverable growth opportunity which the Borough needs to capture.

The site has excellent accessibility to the Strategic Road Network given its location a short drive away from the intersection of M6 and M56 motorways. In addition, it is only around 300m away from the existing Eddie Stobart headquarters facility, which would provide an opportunity for the National Distribution Centre to establish synergies with the headquarters functions, thus enabling the business to provide a significantly better service to its clients.

The proposed development would deliver significant economic benefits, including the creation of approximately 240 new jobs during the construction phase and 480 new jobs on completion, many of which would be available to the most economically disadvantaged residents of the Borough, including young people not in education, employment or training.

Overall, Liberty Properties fully supports the **Council's** ambitions for economic growth within Warrington that are set out within the Proposed Submission Version Local Plan and agrees that there is a clear need for land to be released from the Green Belt to enable the Borough to consolidate its position as one of the most important economic hubs in the UK. The release of the land off Barleycastle Lane from the Green Belt to accommodate the proposed Eddie Stobart National Distribution Centre would deliver significant economic benefits and assist Warrington in realising these ambitions.

We would be grateful if these comments could be given full consideration by the Council and kindly request that we are kept updated on the future stages of the Plan-making process.

If you have any queries or require any further information regarding this site in the meantime, please do not hesitate to contact me.

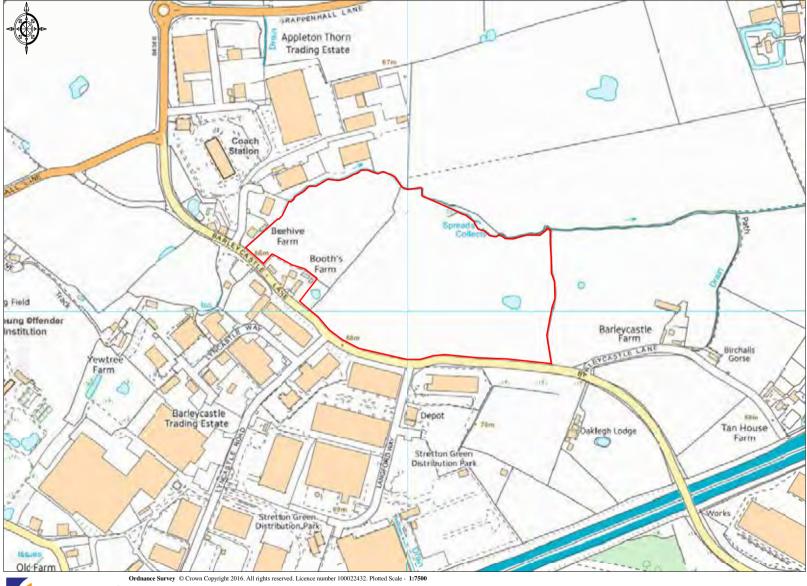
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By email to: localplan@warrington.gov.uk

Dear Sir/Madam,

Consultation on the Warrington Proposed Submission Version Local Plan: Comments on Behalf of Liberty Properties in Relation to Land off **Barleycastle Lane, Appleton (**'Donlan **Site')**

We are writing to you in response to the current Proposed Submission Version Local Plan consultation exercise on behalf of our client, Liberty Properties, in relation to an area of land off Barleycastle Lane in Appleton centred on Barleycastle Farm ('Donlan Site'). A plan of the site, which is approximately 8.7 hectares in size, is enclosed with this letter.

The site falls within a wider area in the south eastern part of the Borough that the Draft Plan is proposing to release from the Green Belt, to develop the Warrington Garden Suburb as a sustainable urban extension which would include around 7,400 homes, 116 hectares of employment land, a central Neighbourhood Centre and an extensive green infrastructure network of open spaces and parkland.

Details of the Garden Suburb Employment Area allocation are set out under Draft Policy DEV4 (Economic Growth and Development). The Policy states that the Garden Suburb site, including the land off Barleycastle Lane, will be removed from the Green Belt and allocated as a new 116-hectare Employment Area in order to help provide sufficient land to meet Warrington's employment land requirement. The Draft Policy goes on to identify the Garden Suburb Employment Area as a preferred location for major warehousing and distribution developments.

As stated previously within the representations submitted in response to the initial 'Call for Sites' exercise in December 2016 and the Preferred Options consultation in September 2017, Liberty Properties fully supports the release of this site from the Green Belt for new employment development.

Appleton is located very close to the key motorway intersection between the M56 and the M6 and the site is located within easy access of Junction 20 of the M6, which provides it with excellent highways connectivity. It is a very well-established employment area which is occupied by a number of major national companies.

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There are no known environmental constraints to the development of the site. It is classified as being at low risk of flooding (falling entirely within Flood Zone 1), it does not fall within an Air Quality Management Area and is not located close to any Local Wildlife Sites, Special Areas of Conservation or Sites of Special Scientific Interest. The land is not known to contain any significant areas of contamination.

The site is in one ownership and the owner is fully supportive of Liberty Properties' proposal to bring it forward for development. Liberty Properties has a track record established over more than 25 years in creating high quality strategic employment development schemes. The company is Cheshire-based and has experience of developing extensively throughout the Borough of Warrington.

Overall, Liberty Properties fully supports the Council's ambitions for economic growth within Warrington that are set out within the Proposed Submission Version Local Plan and agrees that there is a clear need for land to be released from the Green Belt to enable the Borough to consolidate its position as one of the most important economic hubs in the UK. The release of the land off Barleycastle Lane from the Green Belt to accommodate new employment development would deliver significant economic benefits and assist Warrington in realising these ambitions.

We would be grateful if these comments could be given full consideration by the Council kindly request that we are kept updated on the future stages of the Plan-making process.

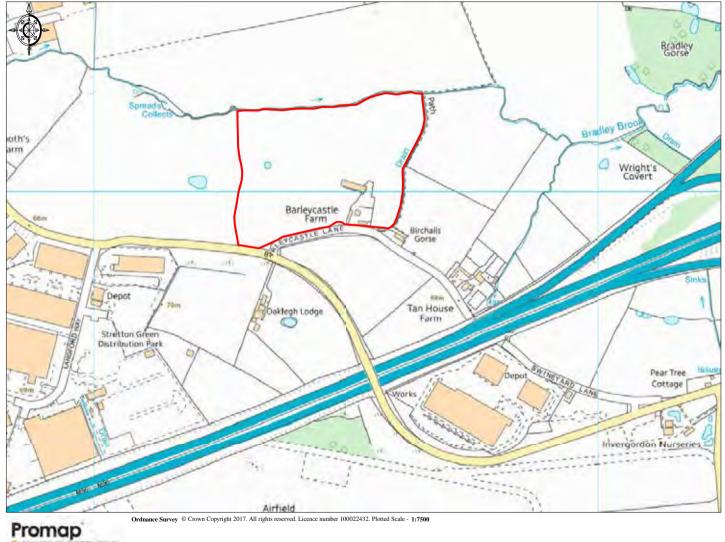
If you have any queries or require any further information regarding this site in the meantime, please do not hesitate to contact me.

Yours faithfully



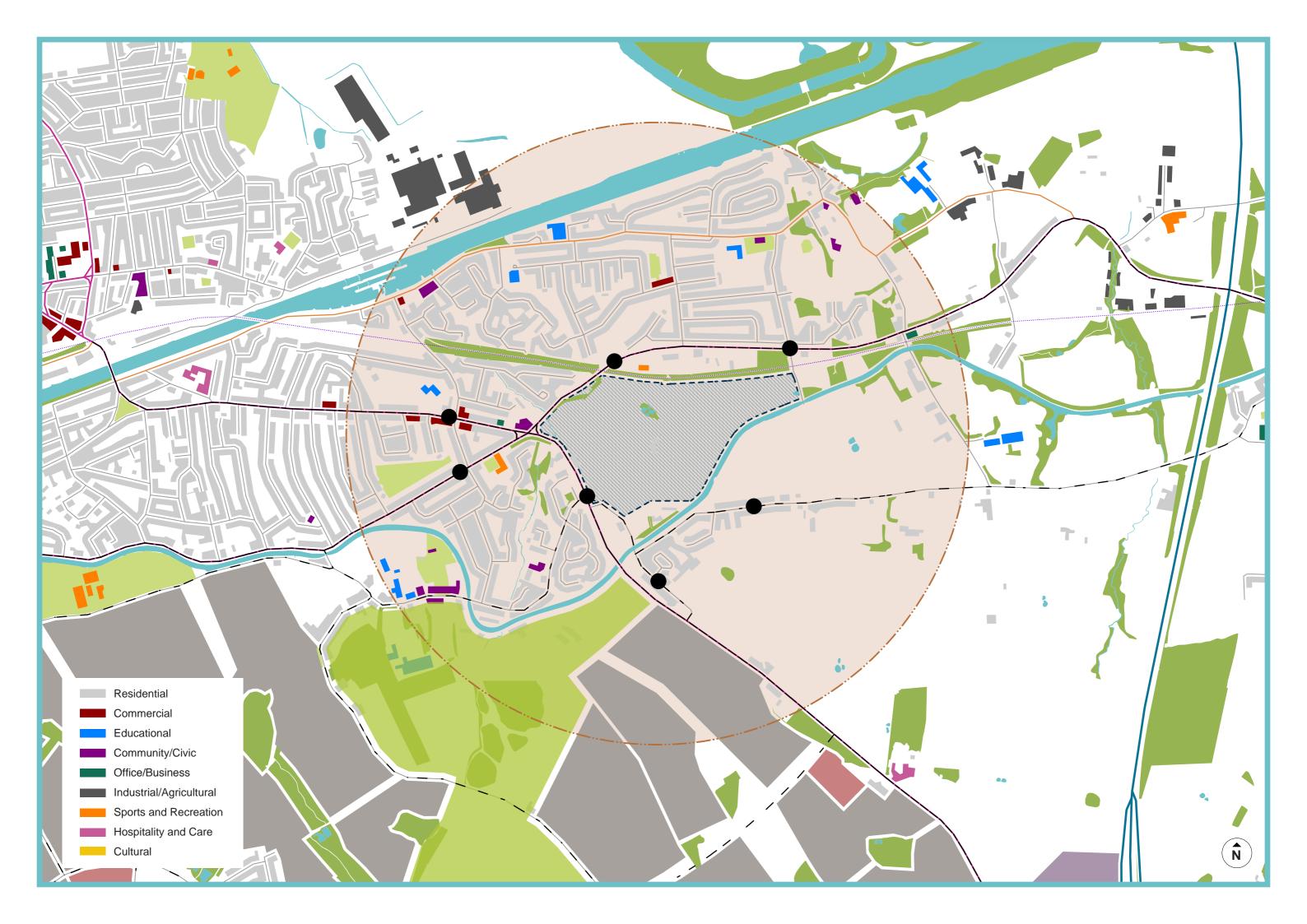
Philip Grant Associate

For and on behalf of GVA Grimley Limited t/a Avison Young









SITE INTRODUCTION

This brief report has been prepared by URBED (Urbanism Environment and Design) for Liberty Properties to explore the case for the allocation of the site indicated to the right between Thelwall Hays and Grappenhall. In doing so we have drawn upon our work on Garden Cities/Towns and Suburbs and in particular our winning entry for the 2014 Wolfson Economics Prize. This made the case for the expansion of medium sized towns like Warrington rather than the development of free standing new settlements.

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The site at Thelwall Heys comprises 20.1 hectares (49.6 acres) of land located to the south of the village of Thelwall and to the east of the village of Grappenhall. The site is currently within the Green Belt but has been considered as a potential housing allocation in the past. In this report we argue that it is probably sensible to remove the land to the South of the canal and east of the A50 from the Garden Suburb but that this doesn't alter the fact that this site is a logical part of the Garden suburb and an excellent early win.

HOW Planning (now Avison Young) together with Planit-IE prepared a masterplan and Development Statement for the site in 2017, informed by a series of technical studies, showing that the site is largely unconstrained and has good access to Warrington's primary public transport networks via bus stops adjacent to the site along Knutsford Road.

This document does not seek to replicate the work of the previous masterplan, but rather looks at the Thelwall Heys site in the context of the Warrington Garden Suburb Development Framework and the emerging Local Plan process, exploring how it relates to the existing South Warrington development boundary.

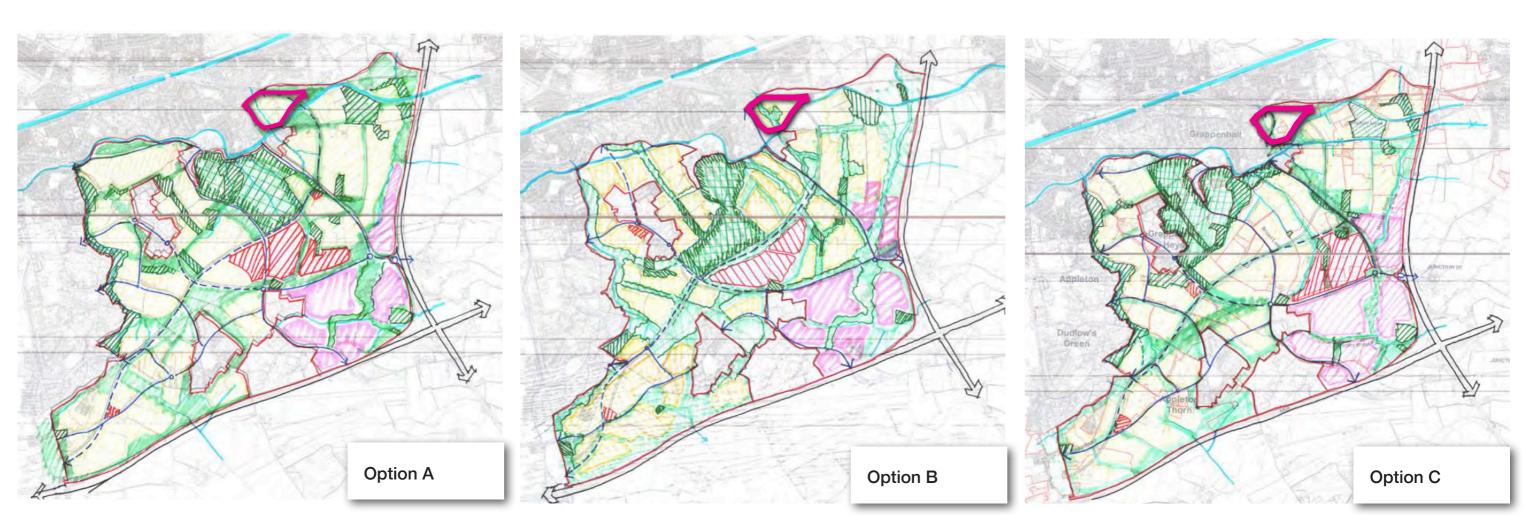




Design Principles

Extract from Development Statement prepared by Planit-IE and HOW Planning on behalf of Liberty Properties in 2017

GARDEN SUBURB DEVELOPMENT FRAMEWORK



Warrington Garden Suburb Development Framework (March 2019) was prepared as a record of the evidence base, engagement process and design studies that underpin the development proposals for Warrington Garden Suburb and consequently informs the preparation of the emerging Local Plan.

Page 50 of the document looks at three different options for the layout of the Garden Suburb, all of which include parcels of residential development at Thelwall Heys (see above).

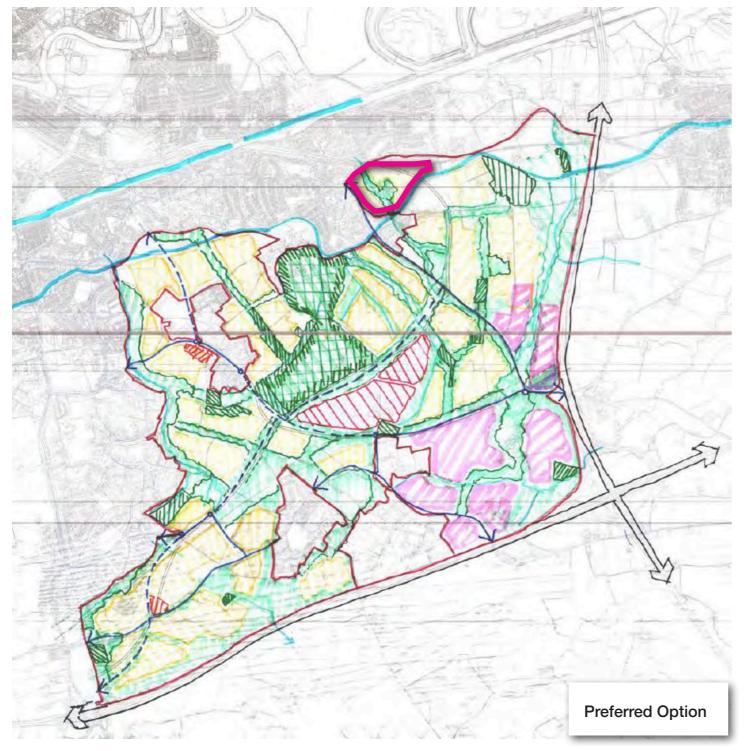
All of the options considered (including the preferred option) showed development on the site, even though this is not reflected in the final framework.

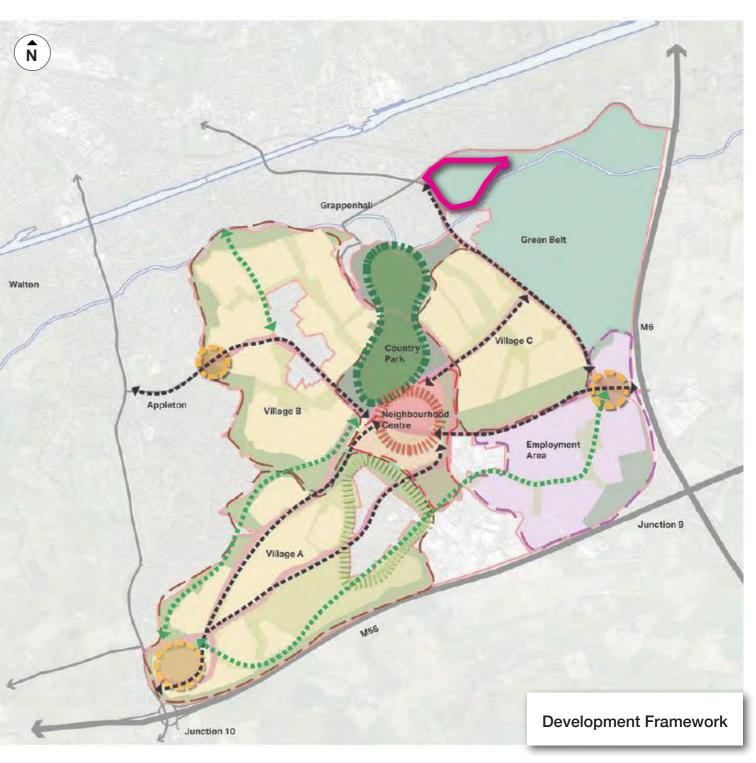


Approximate location of Thelwall Heys site

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GARDEN SUBURB DEVELOPMENT FRAMEWORK

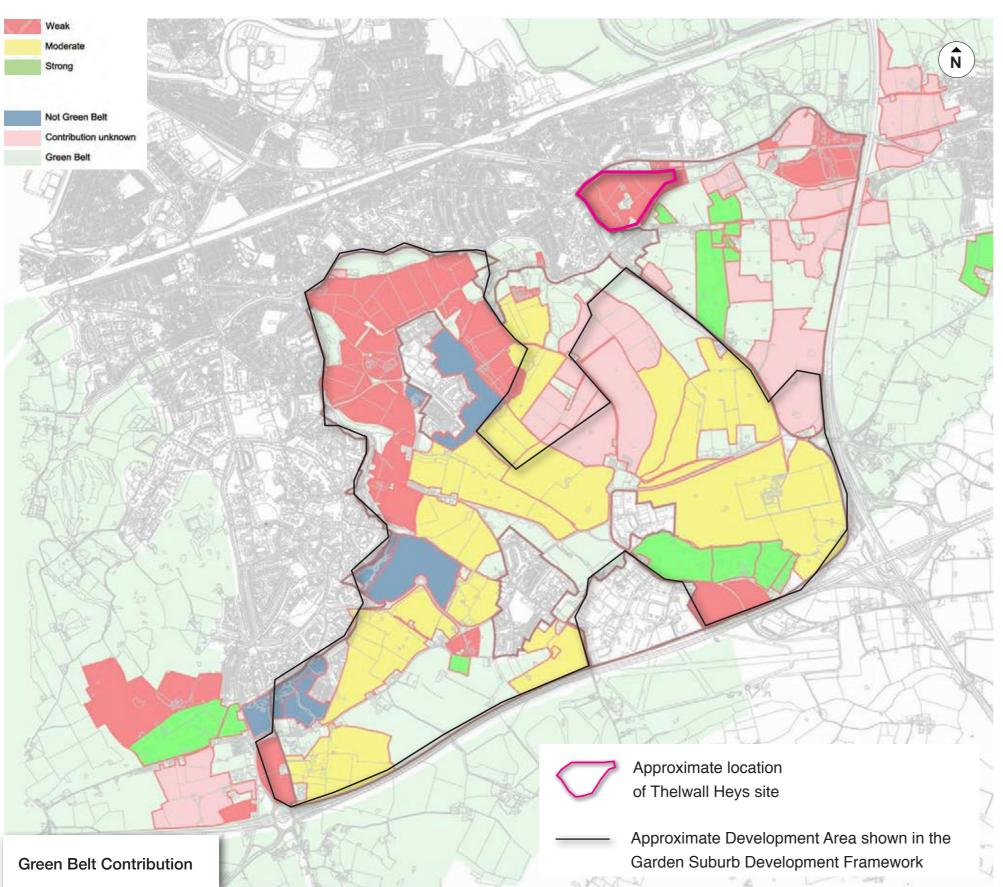




The Preferred Option (above) is based on Option B, and still includes parcels of residential development within the Thelwall Heys site boundary.

However this is not translated into the final Development Framework for the Garden Suburb, and no explanation is given within the document for it's removal.

GARDEN SUBURB DEVELOPMENT FRAMEWORK



As part of the original Local Plan evidence base, a Green Belt Assessment was undertaken by ARUP on behalf of Warrington Borough Council in 2016. The map to the left shows the contribution that sites within the Garden Suburb area make to the Green Belt.

The black line (our addition) shows the area selected for development in the Garden Suburb Development Framework. We can see that the area to be developed contains a combination of sites, including those making a "strong" contribution to the Green Belt.

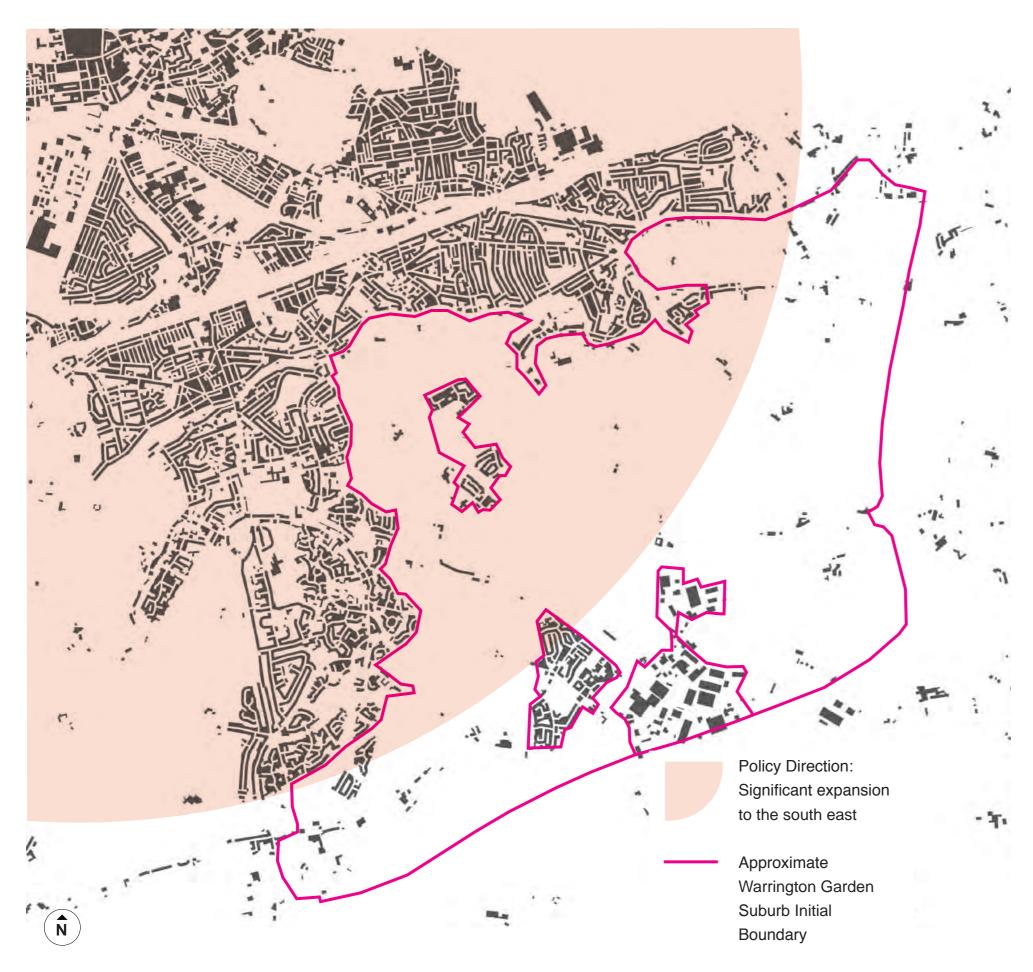
We assume the reason for the removal of the Thelwall Heys site is not related to it's Green Belt contribution; as shown on the plan opposite its contribution is considered to be "weak".

the South.

The site makes a a weak contribution to the green belt- so our focus should turn to the it's relationship with land to



EXPANDING SOUTH WARRINGTON

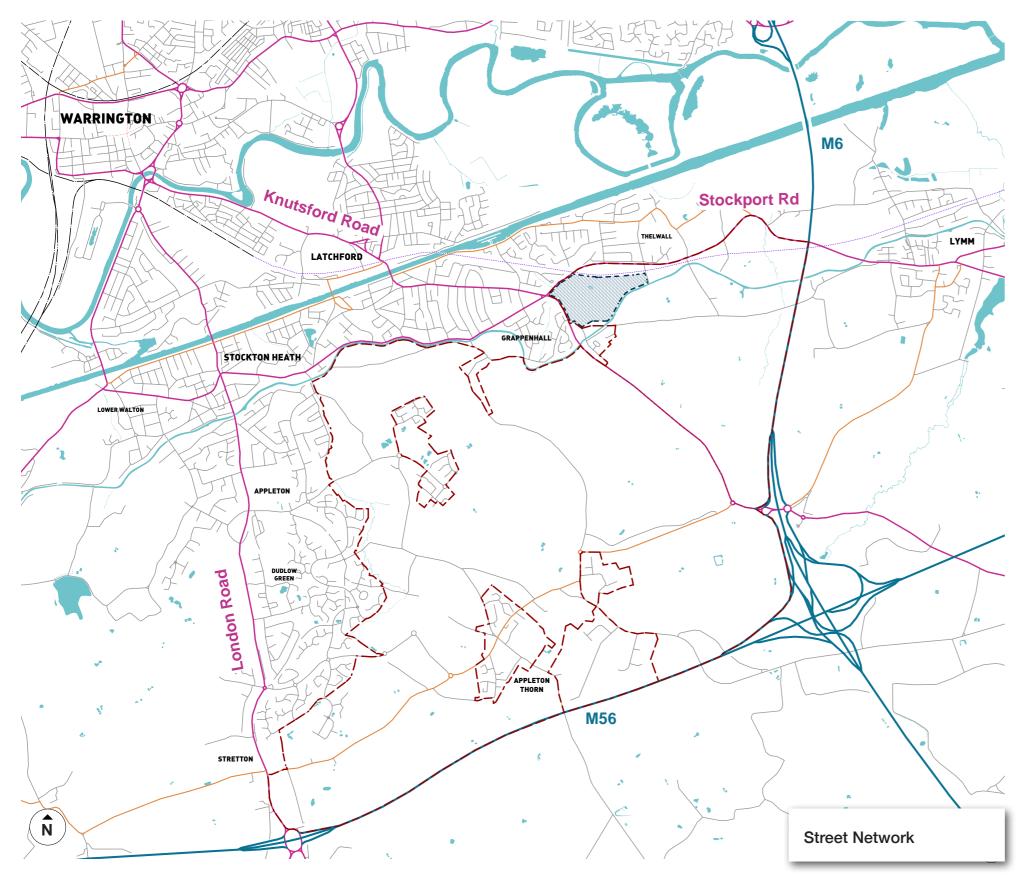


The issue lies with the land to the South of the Canal and to the east of the A50. We understand and concur with the removal of this site from the Garden Suburb area. We suspect that the Thelwall Heys/Grappenhall site has also been removed because it does not have a contiguous area with the rest of the Garden Suburb.

However the proposal is for a Garden *Suburb* rather than a "Garden Town" or "Garden Village". It is not a free standing settlement and no attempt has been made to create a buffer between the suburb and the existing settlement boundary. This is appropriate as we can see that what is being proposed is not a new settlement but an urban extension, expanding Warrington to the south. The whole of south Warrington should therefore be considered to be the Garden Suburb and this site is much more logical when viewed in this light. This is expanded further on the following pages.

The whole of south Warrington should be considered as a Garden Suburb. This site is much more logical when viewed in this light.

THE SOUTH WARRINGTON CONTEXT



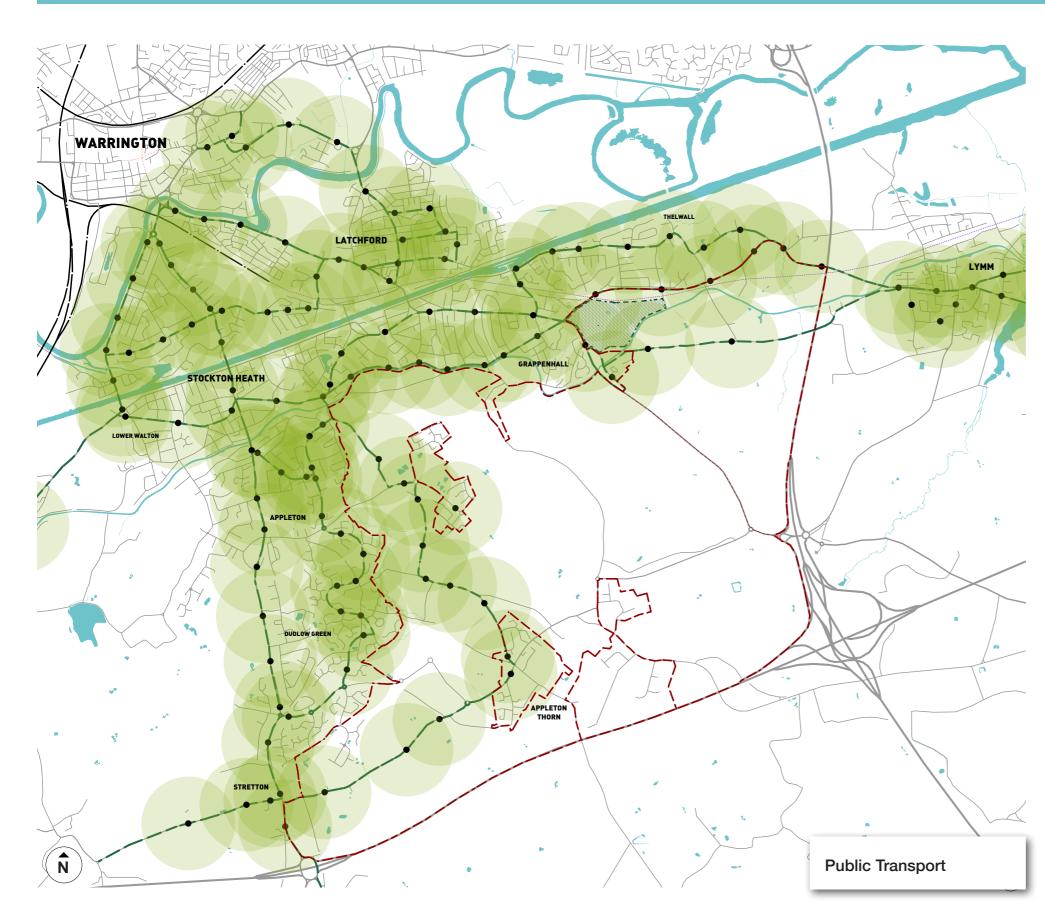
Street Network

The south east of Warrington is bounded by the intersection of the M6 motorway running north-south and the M56 Motorway running east-west.

The local routes form a radial pattern extending from the town centre including the London Road, the Stockport Road and the Knutsford Road (the latter two meeting next to the Thelwall Heys/Grappenhall site. The neighbourhoods of South Warrington have tended to coalesce along these two primary routes; Stockton Heath, Appleton, Dudlow Green and Stretton to the south; Latchford, Grappenhall and Thelwall to the east.

The historic routes are the main focus for public transport and local facilities. The core of the Garden Suburb is isolated from these routes.





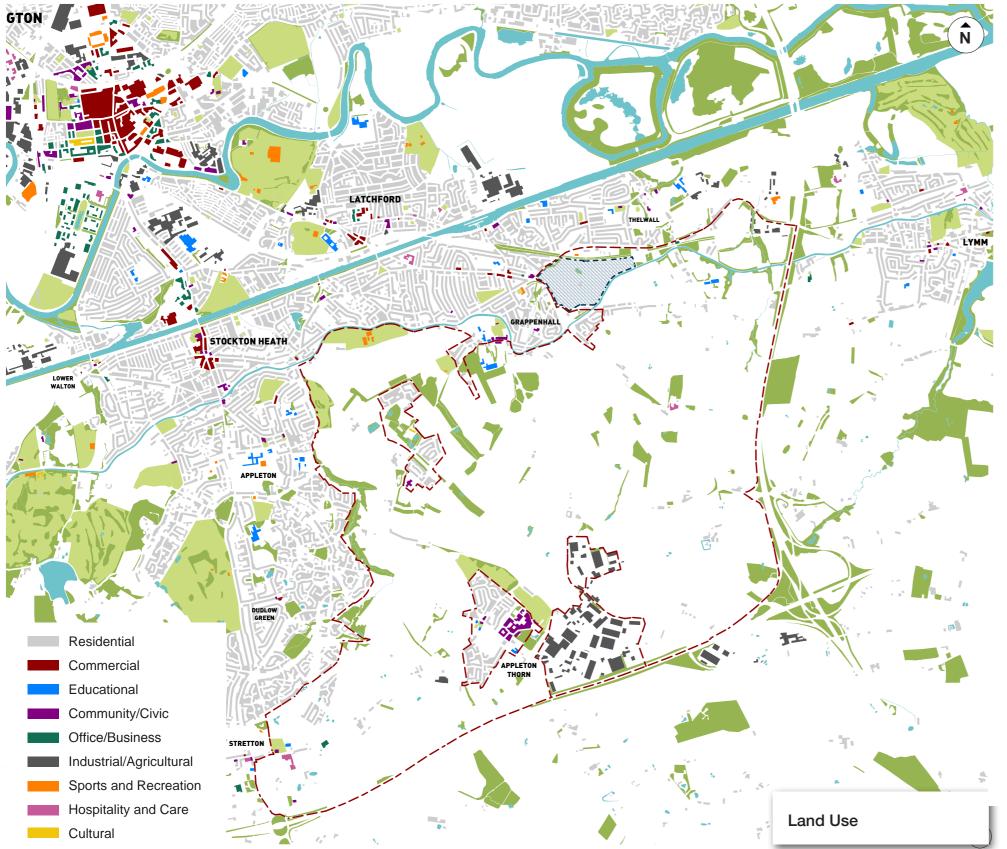
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Public Transport

The map to the left shows a 400m radius (5 minute walk) around bus stops in the South Warrington area. The current neighbourhoods are well integrated into the public transport network, with very few areas of development sitting outside of the accessible 400m radius. It is difficult with new development to create transport links as good as these existing services especially in the early years. The site is therefore likely to be the best connected part of the whole Garden Suburb.

It will take many years for the garden suburb to fund public transport links as good as those that already serve the site.

THE SOUTH WARRINGTON CONTEXT



Land Use

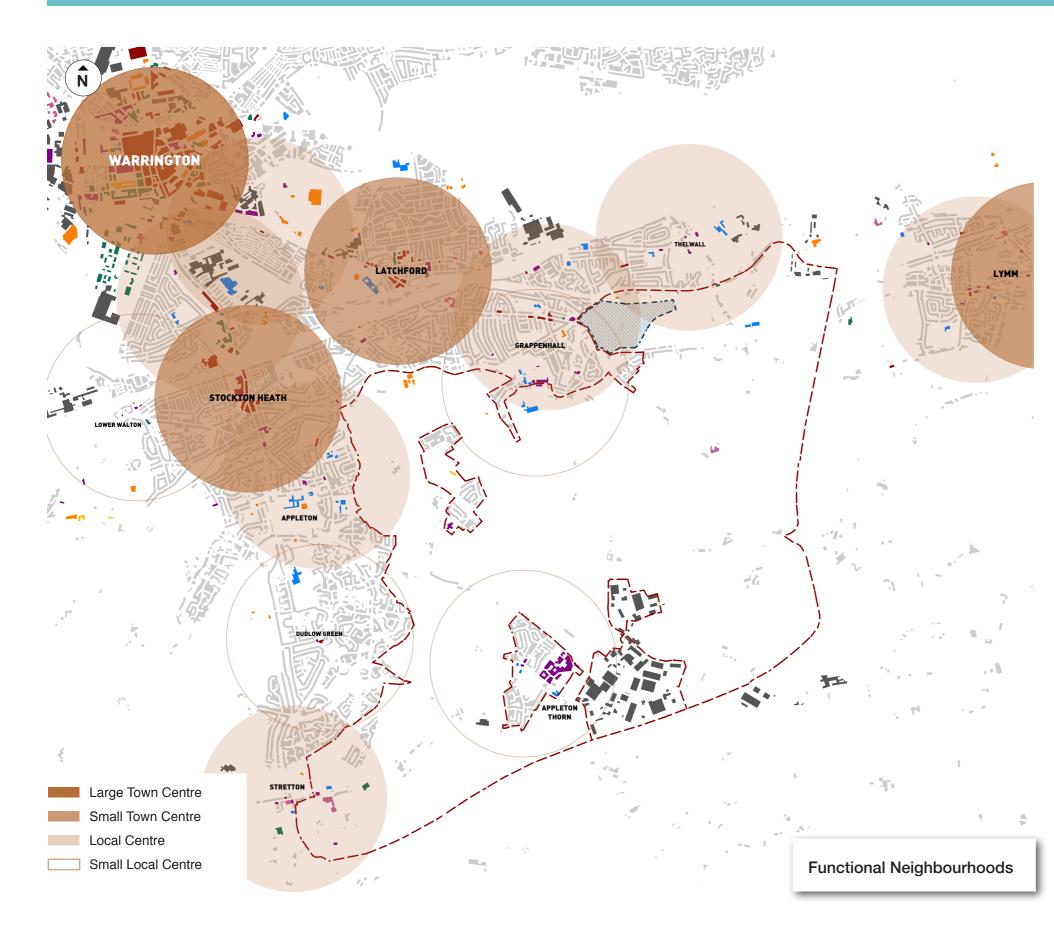
Outside of Warrington Town Centre non-residential uses tend to be clustered in local centres at the heart of the neighbourhoods in South Warrington. These centres typically include uses such as food retail, pubs and cafe's as well as community uses like schools, GP surgeries and places of worship. The two main centres are Stockton Heath and Latchford with a smaller village centre in Old Grappenhall and also on the A50. Until the new garden suburb centre is established these will continue to be the main local services, and these relate much better to the Thelwall Heys/Grappenhall site.

There is a significant employment site to the east of the small village of Appleton Thorn. The employment uses are located some distance from the rest of South Warrington, sitting adjacent to the M56, and so function independently of most of the surrounding area.

local services.

Until the Garden Suburb centre is established the existing centres will be the main

THE SOUTH WARRINGTON CONTEXT



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Functional Neighbourhoods

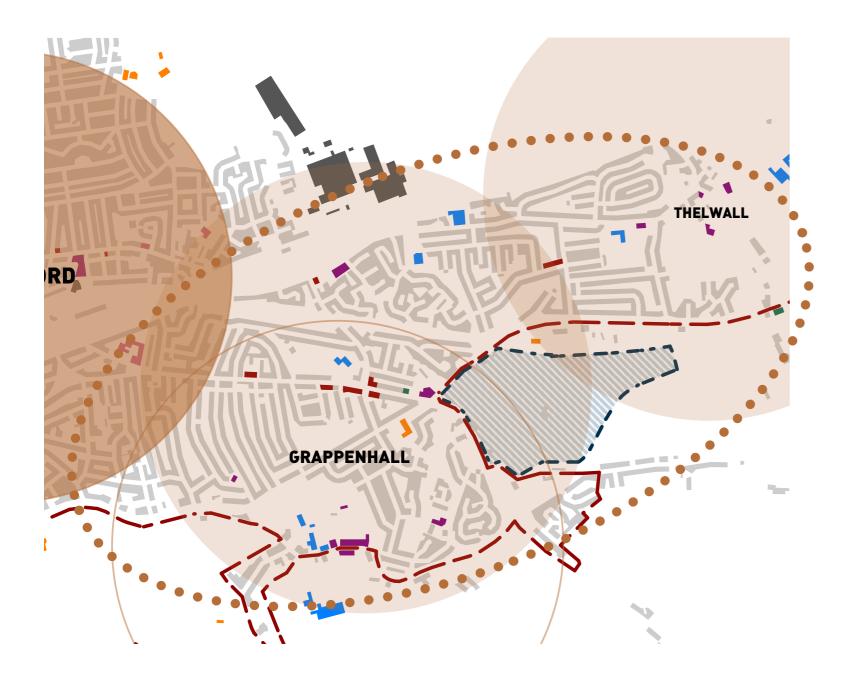
So we can start to draw the structure of South Warrington. Outside the main town centre there are two smaller town centres (or urban villages), either side of the Ship Canal: Stockton Heath and Latchford. There are then a series of neighbourhoods / villages with local facilities and a primary school, including Grappenhall and Thelwall, along with Appleton, Dudlow Green and Stretton.

facilities.

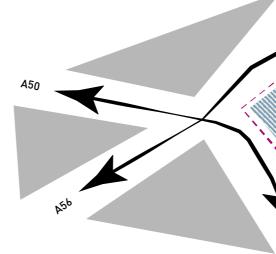


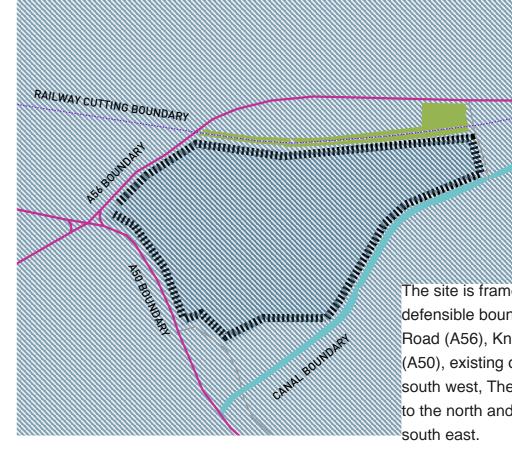
South Warrington is made up of a series of existing neighbourhoods often based around a primary school and local

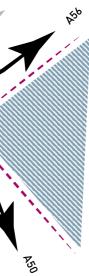
A LOGICAL EXTENSION



Focussing on the Thelwall Heys/Grappenhall site, it becomes clear that it is incredibly well situated with regard to the issues discussed on the previous pages. The main part of the Garden Suburb will be planned to provide a similar level of facilities and public transport, funded by the developers of each phase. However inevitably this provision will be limited in the early years. The Thelwall Heys/Grappenhall site provides an excellent early win that can contribute financially to the Garden Suburb.







Development of the site would complete and strengthen the local centre at the key junction of Knutsford Road and Stockport Road

The site is framed by strong defensible boundaries; Stockport Road (A56), Knutsford Road (A50), existing development to the south west, The railway cutting to the north and the canal to the south east.



A SUSTAINABLE LOCATION

THELWALL NFANT SCHOOL

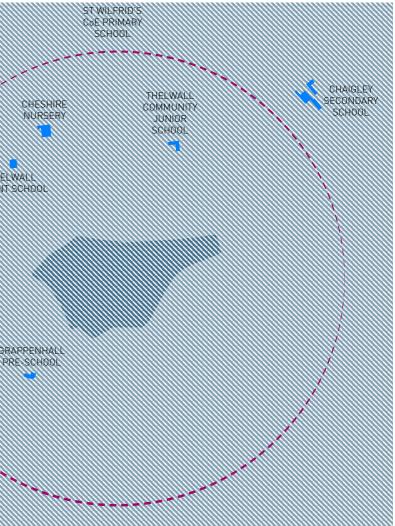
BRADSHAW RIMARY SCHOO

TUGBOATS PRF-SCHOOL ST WILFRID COE PRIMARY CHOOL PUB CHURCH HAIR & BEAUTY, PIZZERIA, GENERAL COMMUNITY PUB STORE CENTRE TESCO, CO-OP, HAIRDRESSER TAKFAWAYS PUR PUB

There are multiple shops and services with a 1km radius, including a small local centre with a Tesco and Co-op 300m down the road.

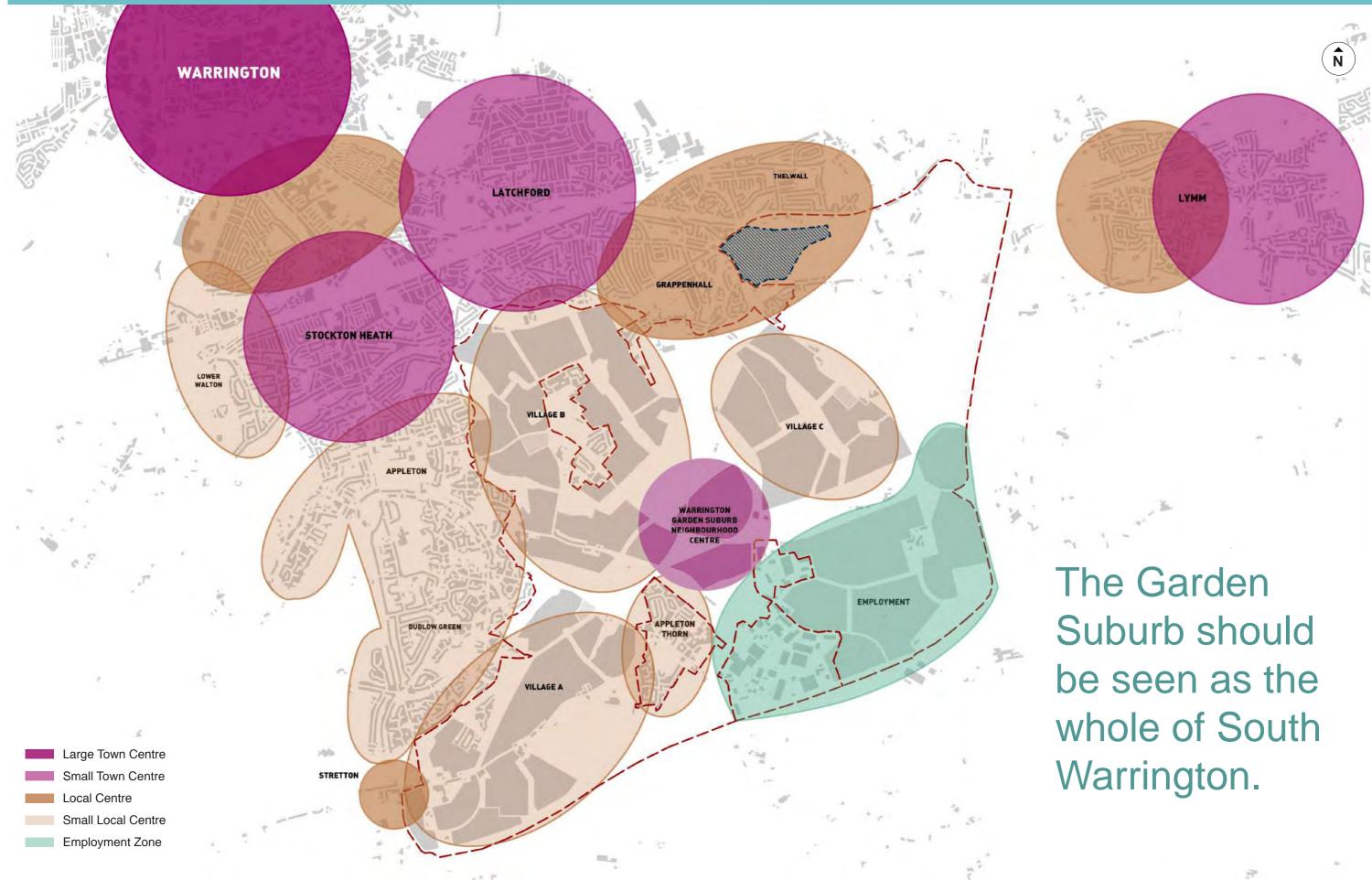
The site is already well integrated into Warrington's primary public transport network, with multiple bus stops within 400m.

The site provides a sustainable early win, whilst also making a financial contribution to the wider Garden Suburb.



There are numerous schools within a 1km radius of the site, most of which have an OFSTED rating of "Good" or "Outstanding".

THE WIDER GARDEN SUBURB



COMPATIBILITY WITH THE GARDEN SUBURB

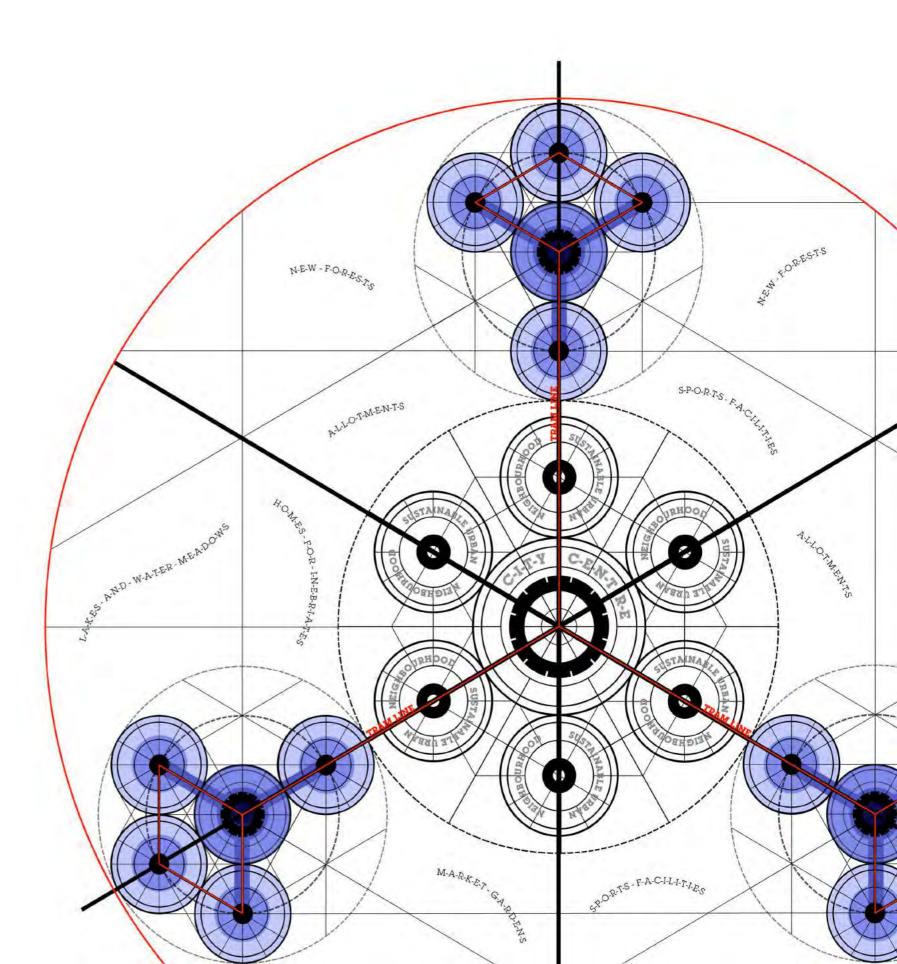
We therefore believe there is a compelling case for the Thelwall Heys/Grappenhall site to be allocated for housing in its own right. It is rated as making a weak contribution to the green belt and it is well located for public transport and existing facilities. It constitutes a logical rounding-off of the existing settlement up to the new defensible boundary of the canal and is worthy of allocation regardless of the proposals for the Garden Suburb.

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However, it would be stronger still if it was included in the Garden Suburb. In URBED's Wolfson Prize essay we argued that the Garden City was not the extension to a settlement (shown in blue on the diagram to the right) but the whole of the town. The new and the existing should be treated as one, linked by public transport and shared facilities.

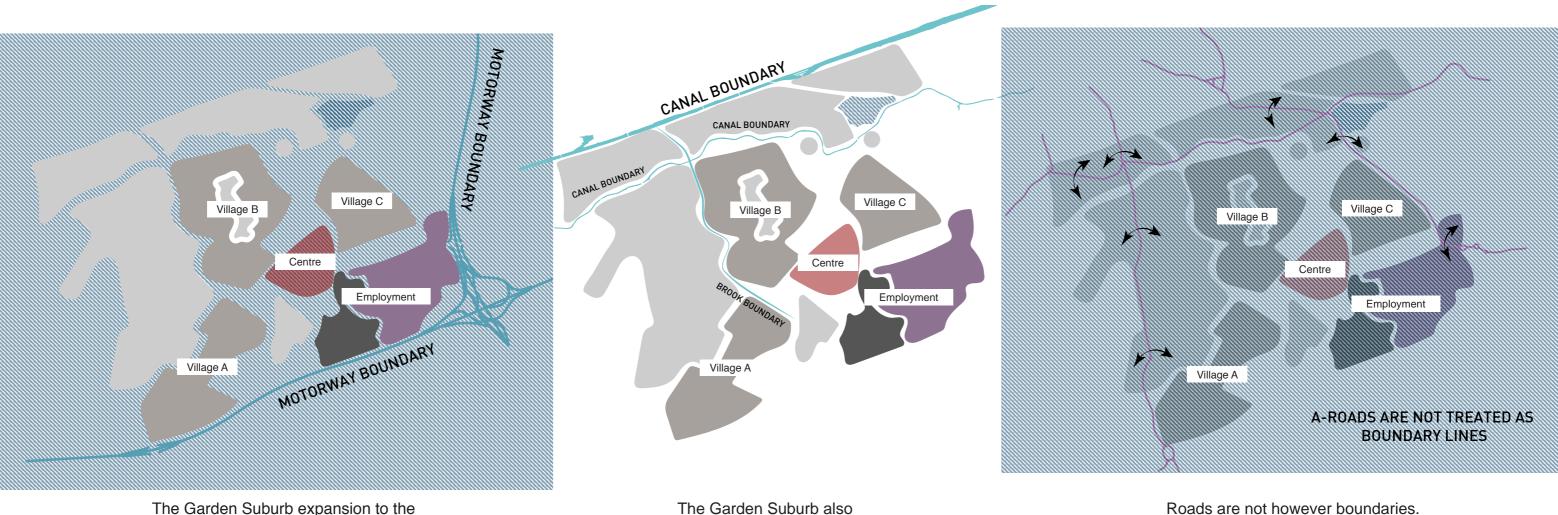
The South Warrington Garden Suburb is therefore the area shown on the plan to the left. It includes the proposed new development and the existing neighbourhoods, schools, facilities and public transport routes of South Warrington. If you conceive of the Garden Suburb in this way the Thelwall Heys/ Grappenhall site becomes a much more logical part of the whole. It can contribute financially to the infrastructure required for the wider garden suburb development and form an ideal first phase.

This is an excellent site in its own right, but is stronger still seen as part of the Garden Suburb.



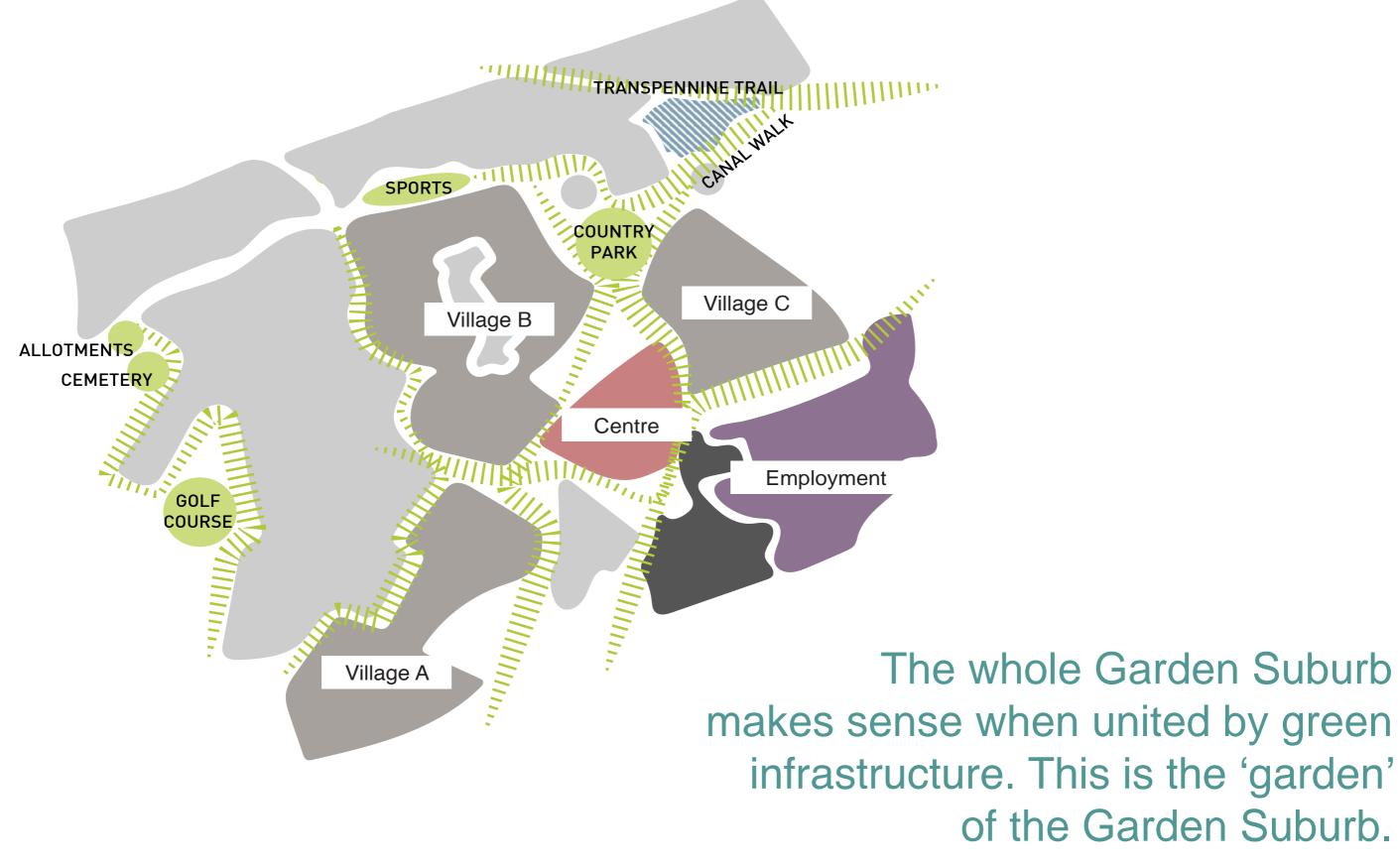
NEW NEIGHBOURHOODS

We have reconceptualised the preferred option for the Garden Suburb, showing how the site can become a logical part of the whole Garden Suburb.



The Garden Suburb expansion to the south east is contained by the barrier of the motorway.

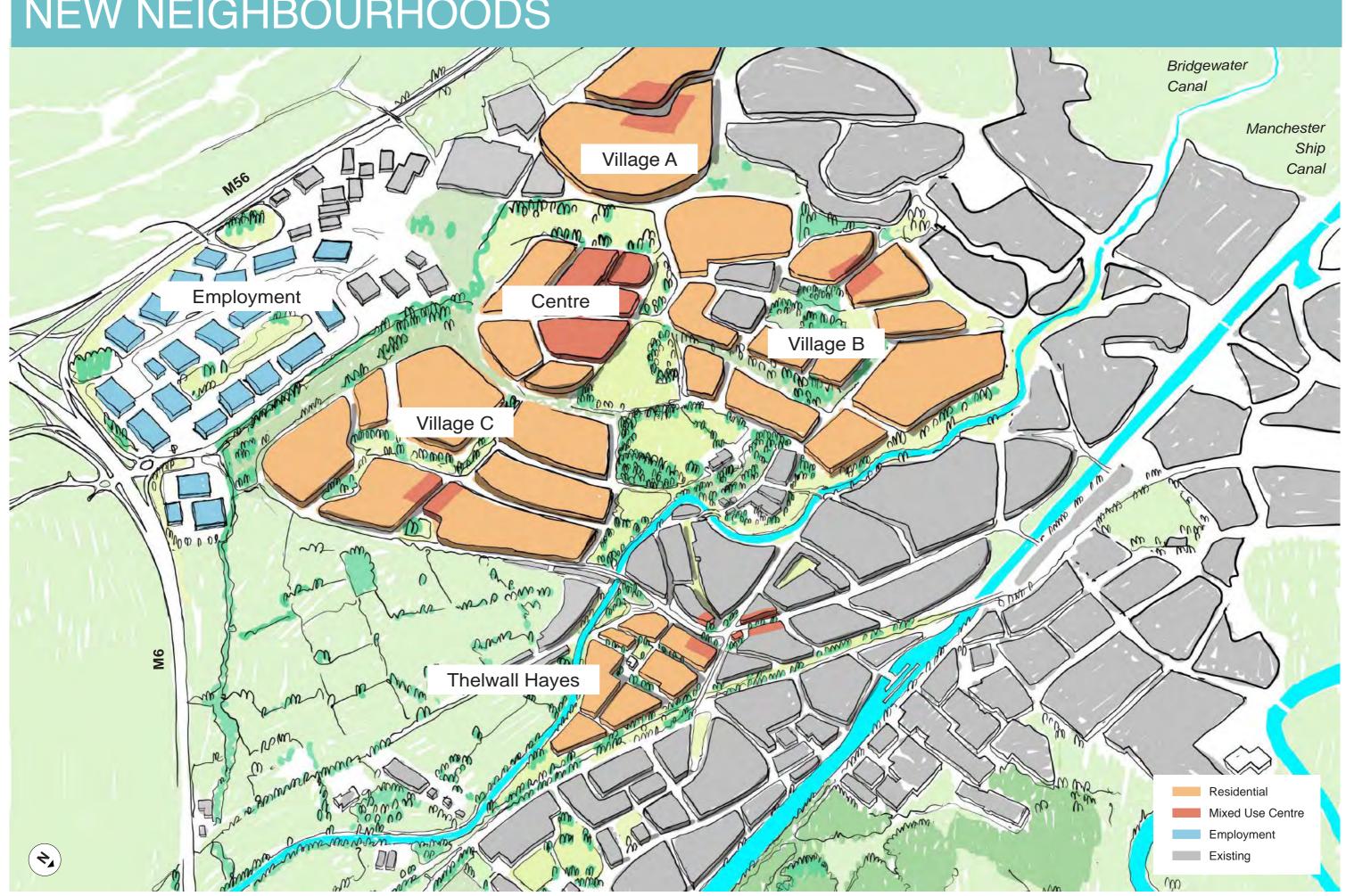
The Garden Suburb also acknowledges the traditional boundaries of watercourses which currently create definition between the South Warrington neighbourhoods Roads are not however boundaries. Traditionally high streets and secondary streets go through the heart of a neighbourhood with development on both sides. urbed





The whole Garden Suburb of the Garden Suburb.

NEW NEIGHBOURHOODS

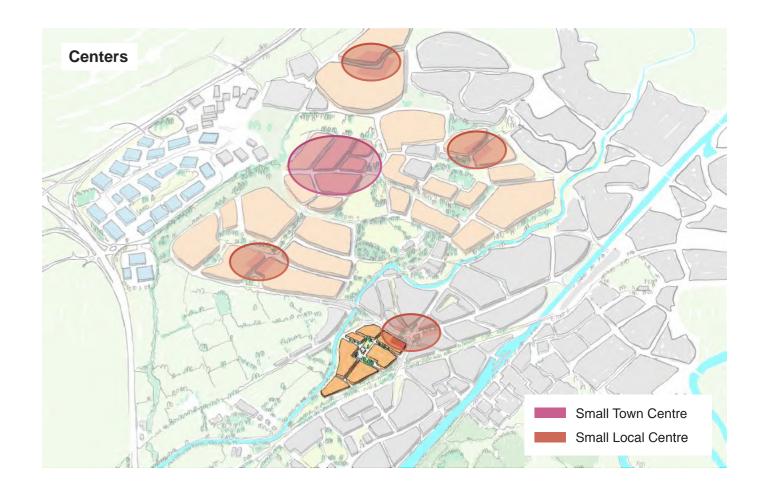


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NEW NEIGHBOURHOODS

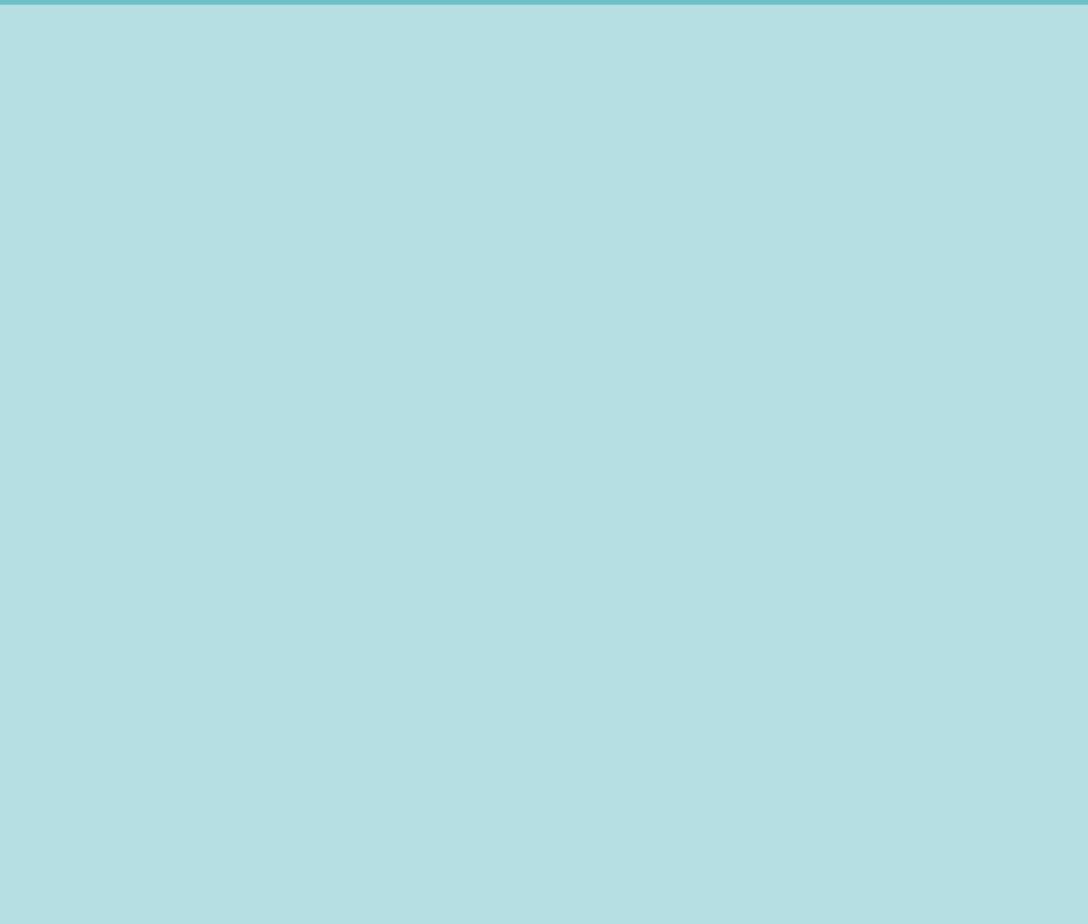






These sketch images show how the

site fits within the reconceptualised preferred option.



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