
Warrington Local Plan Regulation 19 Consultation

Representations on behalf of Anwyl Land

November 2021

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1.0 INTRODUCTION

Background

- 1.1 These representations are submitted by Barton Willmore on behalf of Anwyl Land Ltd ('our Client') to Warrington Borough Council ('the Council') in response to the Warrington Local Plan Regulation 19 Consultation, which is taking place between 4th October and 15th November 2021.
- 1.2 The Regulation 19 Consultation represents the latest stage of consultation in the preparation of the Local Plan, and follows on from the Regulation 19 Consultation of the Draft Local Plan (Proposed Submission Version) in 2019 and the Preferred Development Options Consultation in 2017. Once adopted, the Local Plan will replace the existing development plan for the Borough, which comprises the Warrington Local Plan Core Strategy (2014).
- 1.3 Barton Willmore have previously engaged with the Local Plan preparation process, and made representations on behalf of Anwyl to both of the previous consultations, as above. In particular, those representations actively promoted our Client's land interests at Mill Lane, Lymm. However, their land interests have not been taken forward by the Council as a potential allocation within the Local Plan. These representations sustain the Site at Mill Lane comprises a sustainable location for residential development, which will assist in meeting the Borough's local housing need.
- 1.4 The updated Proposed Submission Version Local Plan 2021 makes a number of key changes to the 2019 Draft Local Plan, including:
- A reduction in new housing from 945 a year over 20 years, to 816 a year over a reduced plan period of 18 years (2021-2038 inclusive).
 - Proposals for 580 hectares to be removed from the Green Belt for development. This equates to 5% of Green Belt land in the borough and is significantly lower than the 1,210 hectares proposed in the previous Plan, which equated to 11% of the total amount of Green Belt.
 - The removal of the residential allocations at the South West Urban Extension (1,600 homes), Phipps Lane in Burtonwood Village (160 homes), and Massey Brook Lane in Lymm (60 homes) from the Plan.
 - Moving away from the Garden Suburb concept in South Warrington (4,200 new homes in the plan period), and instead including new proposals for a South East

Warrington Urban Extension, with a reduced allocation of 2,400 new homes during the plan period.

- The removal of Port Warrington (75ha employment land) and the Business Hub (25ha employment land) from the plan.
- The inclusion of the Fiddler's Ferry site in the Plan at a late stage, with the closure of the power station in March 2020 providing the opportunity to bring the site into the allocation.

1.5 As the draft Local Plan has now reached the publication stage, comments made within these representations will be structured around the tests of soundness as set out at Paragraph 35 of the NPPF.

1.6 Paragraph 35 of the NPPF sets out that the Local Plan will be examined to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound. The tests of 'soundness' are as follows:

- a) "Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."*

1.7 Our Client has concerns with the overall level of growth and the spatial strategy set out in the emerging Local Plan which is not considered to be sufficient to ensure that future growth needs are met across the district as a whole. In particular, it is our position that the proposed housing allocations are not sufficient in meeting the identified housing need for the Borough.

Our Client's Land Interests

- 1.8 Our Client has land interests at Mill Lane, to the north east of Lymm. Lymm is identified within the draft Local Plan as an inset settlement. The Site is located adjacent to local convenience shopping facilities at Heatley Mere to the north, 1.8km from Lymm Neighbourhood Centre to the west and 13km from Warrington Town Centre to the north west. The Site is outside of the settlement boundary and is currently designated as Green Belt land.
- 1.9 The Site is currently used as agricultural land split into 4 irregular shaped fields, separated by hedgerows of various condition and quality and interspersed with a number of mature native trees. The north easterly field includes a small pond surrounded by a few mature trees; the pond is designated as a feature of Biodiversity Importance under the existing and emerging development plan. There is a Public Right of Way (PROW) running roughly west to east across the Site between the junction of Sandy Lane and Stage Lane in the west and Mill Lane in the east.
- 1.10 The Site is bound by Heatley Flash Lake to the north, Mill Lane to the east and Stage Lane to the south. Residential properties in Oughtrington bound the Site to the west. The Site boundaries along the perimeter of the Site comprise similarly mixed condition of hedgerow planting with sporadic mature native trees; some groups of trees are subject to Tree Preservation Orders (TPOs).
- 1.11 The surrounding has a predominantly residential character, with the majority of existing properties taking the form of detached and semi-detached dwellings, as well as bungalows. Newer development to the north of Site comprises higher density townhouses.
- 1.12 The Site sits entirely within Flood Zone 1 as denoted by the Environment Agency's Flood Zone Mapping, and is therefore at the lowest risk of flooding. There are a number of heritage assets within located to the east of Stage Lane, including a number of Grade II Listed bridge structures located along the Bridgewater Canal, as well as the Grade II Listed Coach House and Nook and Pump and Trough in the grounds.
- 1.13 With the exception of two applications for the erection of a bungalow for the use of agricultural workers (application refs. 86/18873 and 87/20323), and an application for a new horse menage (application ref. 2014/23077), located at the south east corner of

the Site, the Site has no previous planning applications for major residential development.

- 1.14 The Site is identified within the Warrington Borough Local Plan Strategic Housing Land Availability Assessment 2020 (SHLAA) as site reference 3162. The Site is classified as constrained due to its location within the Green Belt. It is stated that that it is premature for the SHLAA to endorse specific sites in the Green Belt as suitable for residential development in advance of any comprehensive review of Warrington's Green Belt to evaluate whether there are appropriate locations for future development.

Scope of Representations

- 1.15 The remaining sections of these representation are structured as follows:
- Section 2 provides our Client's comments on the Introduction, Challenges and Vision and Objective chapters of the Submission Draft Local Plan.
 - Section 3 raises fundamental concerns towards the Council's Spatial Strategy, which seeks to deliver the majority of growth within the existing main urban area of Warrington.
 - Section 4 includes a comprehensive analysis of the proposed housing policies within the emerging Local Plan.
 - Section 5 provides our comments on further policies of the Local Plan (Policies INF1, INF5, ENV2 and ENV7).
 - Section 6 sets out why our Client's Site is a sustainable location for housing and why its should be released from, the Green Belt and allocated in the emerging Local Plan.
 - Section 8 provides a summary and concluding remarks.

2.0 LOCAL PLAN CONTEXT

Introduction

- 2.1 Our Client supports the preparation of a new Local Plan to replace the existing Local Plan Core Strategy, which was adopted in 2014. Our Client welcomes the Introduction chapter of the Plan and the stated plan period of 2021 – 2038, which addresses the NPPF requirement at paragraph 22 to consider at least 15 years in plan making. We assume that the actual period runs from 1st April 2021 to 31st March 2038 in line with the Council's plan monitoring, however it would be helpful if this were clarified.
- 2.2 Chapter 1 of the draft Local Plan identifies a number of significant changes from the previous Proposed Submission Version Local Plan (2019). These changes include:
- A reduction of the Plan's housing requirement, which we consider to be unjustified;
 - The allocation of the Fiddlers ferry site for employment and housing, following closure of the power station in March 2020;
 - The removal of some of the previous Green Belt allocation sites, including Port Warrington and the Business Hub, the South West Urban Extension, the Phipps Lane site in Burtonwood and the Massey Brook Lane site in Lymm; and
 - The reduction in size of the South East Warrington Urban Extension (previously known as the Garden Suburb).
- 2.3 Overall, we urge caution in reducing the Plan's housing requirement and the removal of some of the previous allocated Green Belt sites. The amount of land proposed to be removed from the Green Belt is 580ha, which equates to 5% of the total amount of Green Belt land in the borough. This is significantly lower than the 1,210 hectares proposed to be removed from the Green Belt in the previous Proposed Submission Version Local Plan, which equated to 11% of the total amount of Green Belt in the Borough.
- 2.4 Our Client supports in principle the need for the allocation of sites within outlying settlements to boost homes within the local area. It is our Client's view that the amount of housing proposed within these outlying settlements is not sufficient to meet identified needs and further land release is required. This is on the basis of overall concerns with the proposed housing requirements and the deliverability of the sites identified within

the Urban Area in the Town Centre and at the newly allocated Fiddlers Ferry Site. This position is discussed in more detail in Sections 3 and 4 of these representations.

2.5 Indeed, there appears to be a mismatch between the Borough's approach to employment growth (jobs) and the number of homes to be provided. This is an acute issue in Warrington, as the existing motorway infrastructure already leads to a high level of in-commuting. Birchwood Park is a casing point of in-commuting and experiences significant traffic congestion.

Spatial Portrait

2.6 Section 2 of the Draft Local Plan describes the spatial portrait of the Borough of Warrington and identifies a number of challenges which need to be addressed in order to improve the Borough for those who live, work and visit Warrington. The key challenges which the Borough faces are identified as:

- Limited housing and employment land supply;
- Housing affordability concerns;
- Meeting the needs of an aging population;
- Car dependency;
- Traffic congestion;
- Air quality impacts;
- The sustainable supply of minerals and mineral products to meet development aspirations;
- Management of waterways;
- Importing waste;
- Aging infrastructure; and
- Areas of deprivation.

2.7 As detailed above, it is clear that the Borough is facing challenges in relation to housing and affordable housing supply. It, therefore, remains our position that the proposed reduction in housing requirement and allocations to meet this requirement is not sufficient in tackling these challenges identified by the Council. This is explored in more detail in Section 4 of these representations.

Vision and Objectives

Vision

- 2.8 The Draft Local Plan identifies a 10-point Vision. Our Client is generally supportive of the overall proposed Vision for Warrington, which is generally consistent with national policy and will help bring forward positive social, economic and environmental change.
- 2.9 As stated within our previous representations, as drafted, the proposed Vision is significantly lengthy, causing its focus and intent to be lost. The Vision should be short and concise, setting out the Council's Vision for the Local Plan going forward, and the need to boost housing and employment and the Borough's role in delivering these needs during the Plan period.
- 2.10 If the Council is minded to retain the Vision as drafted, we suggest that "to achieve this Vision" is inserted prior to Points (2) to (11), to confirm what the Council intends to do to support the delivery of the Vision. There also appears to be substantial overlap and unnecessary repetition between the matters identified within the Vision and subsequent Strategic Objectives.

Strategic Objectives

- 2.11 The Draft Local Plan identified 6 key objectives, as set out below (Objectives W1 – W6):
- W1: To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:
 - Delivering a minimum of 14,688 new homes (equating to 816 per year) between 2021 and 2038, and
 - Supporting Warrington's ongoing economic success by ensuring provision is made to meet the need for 316.26 hectares of employment land between 2021 and 2038.
 - W2: To ensure Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.

- W3: To strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub, whilst transforming the quality of the public realm and making the Town Centre a place where people want to live.
- W4: To provide new infrastructure and services to support Warrington's growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.
- W5: To secure high quality design which reinforces the character and local distinctiveness of Warrington's urban area, its countryside, its unique pattern of waterways and green spaces and its constituent settlements whilst protecting, enhancing and embracing the Borough's historic, cultural, built and natural assets.
- W6: To minimise the impact of development on the environment through the prudent use of resources and ensuring development contributes to reducing carbon emissions, is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington's air quality.

2.12 Our Client is generally supportive of the Objectives listed above, which remain largely unchanged from the previous iteration of the Plan. An exception to this is the significant reduction in the housing delivery requirement, from 945 per year to 816 per year. This is based on the Standard Method Calculation of housing need.

2.13 Planning Practice Guidance makes clear that the standard method for assessing local housing need provides a *minimum starting point* in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour (Reference ID: 2a-010-20201216). The Standard Method Calculation does not produce a housing requirement figure, and we therefore urge caution in proposing the Standard Method Calculation as the housing requirement.

2.14 Paragraph 3.2.5 of the justification for the Strategic Objectives states that the Objectives have been updated to reflect the higher level of development that Warrington must plan for in order to meet its future development needs whilst retaining the character and liveability of the town. However, Objective W1 contradicts this statement and actually reflects a reduction in the planned level of development, particularly in relation to housing.

- 2.15 Furthermore, our Client is concerned that the emerging Local Plan fails to consider in full the role of the outlying settlement due to the Plan's continued focus on the Warrington Urban Area.
- 2.16 It is our Client's position that this over-reliance on the Urban Area will result in deliverability issues over the Plan period. We, therefore, consider that the Local Plan needs to be sufficiently equipped to respond to these issues, and to secure the vitality and viability of these outlying settlements and rural areas. This recognition should be made upfront within the Strategic Objectives.

3.0 SPATIAL STRATEGY

3.1 The Council has set out its approach to the spatial strategy to meet the needs of the Borough over the Plan period, which involves the need for Green Belt release. The existing urban area can accommodate around 11,800 new homes, meaning that there is a requirement to release Green Belt land for approximately 4,500 homes in order for the Council to meet their housing requirement. Notwithstanding this, as detailed within Section 2, a significant number of proposed sites for Green Belt release have been removed since the 2019 iteration of the Draft Local Plan.

3.2 The chosen spatial strategy for the distribution of homes requiring Green Belt release is set out below:

- An urban extension to the south east of the main urban area, which will deliver around 2,400 homes in the Plan period up to 2038, with a potential for a further 1,800 homes beyond the plan period;
- Development of Fiddlers Ferry opportunity site for 1,300 homes in the Plan period up to 2038, with a potential for a further 450 homes beyond the Plan period;
- Development at Thewall Heys of around 310 homes; and
- 'incremental growth' across the outlying settlements of around 800 homes.

2.2 The need to create a new garden suburb and urban extension is generally supported, alongside the need for development in outlying villages. However, we urge caution in the reliance of the Fiddlers Ferry opportunity site to provide 1,310 homes within the Plan period. The Council have published evidence base documents for the Fiddlers Ferry Regeneration, including a Masterplan, Regeneration Vision and Density Assessment. However, the Site is not assessed as part of Warrington's Strategic Housing Land Availability Assessment (SHLAA) and there is no evidence published on the Council's website which confirms that the Site is deliverable or developable, in accordance with paragraph 68 of the National Planning Policy Framework (NPPF) (2021).

2.3 Furthermore, the Fiddlers Ferry Site has known contamination issues which need to be explored prior to its allocation for housing development. The Council's allocation of this land is not justified and there is a clear lack of evidence which confirms the deliverability of the Site. As such, the Council should not rely on the Fiddlers Ferry Site to deliver such a substantial amount of new housing within the Plan period, and further housing allocations should be made.

- 2.4 Furthermore, our Client does not support the continued approach taken by the Council as to how and why only appropriate “incremental growth” for each outlying settlement is proposed.
- 2.5 The Council’s justification for incremental growth is based on a 10% growth limit as confirmed in the Council’s response to the Regulation 18 consultation, but this itself is not based on any substantiated evidence base, rather it is based on a housing needs assessment basis. The Council’s justification for the 10% limit is in relation to settlement size to ensure that development is capable of being accommodated without changing the character of the respective settlement, in a sustainable manner to ensure the viability and vitality of that settlement over the Plan period.
- 2.6 The Council have also reduced the amount of development proposed in the outlying settlements from 1,100 homes to 800 homes over the plan period. It is our Client’s position that insufficient justification or rationale has been provided to explain this approach and we maintain that the outlying settlements will require a greater level of development to sustain their viability and vitality.
- 2.7 The Council provides their proposed case for exceptional circumstances which justifies the need for Green Belt release. It is our Client’s position that the Council’s justification for Green Belt release is appropriate, particularly as it has been demonstrated that there is insufficient capacity to meet the Borough’s housing needs within the Urban Area accordingly, and as such, Green Belt release is required. This approach and justification is compliant with Paragraph 139 of the NPPF and is therefore supported by our Client.

4.0 LOCAL PLAN APPROACH TO HOUSING DELIVERY

Policy DEV1 – Housing Delivery

Housing Requirement

- 4.1 Policy DEV1 sets out the Council's requirement for the delivery of a minimum of 14,688 new homes to be delivered over the 18 year Plan period from 2021 to 2038 (equating to an average of 816 homes per annum). According to the Council's Local Housing Needs Assessment Update (LHNA) (August 2021), this has been informed by the employment forecasts over the Plan Period.
- 4.2 It is, however, our position that the Borough's approach to employment growth (jobs) and the number of homes to be provided is mismatched. Notwithstanding that Warrington has experienced significant levels of employment growth in the past, the LHNA confirms that a 'mid-point' forecast of employment growth has been adopted and this, as well as current commuting patterns, does not justify an increase to the housing requirement to support employment growth in Warrington.
- 4.3 Our Client strongly opposes this approach and does not believe it has been sufficiently justified. In particular, the impacts of in-commuting are already an issue within Warrington. The existing motorway infrastructure struggles to accommodate the volume of commuting workers and experiences significant traffic congestion, particularly at peak times. The Council's stagnant approach to job growth and housing delivery will therefore, only increase the number of commuters and heighten this issue, which will have a number of social, economic and environmental impacts.
- 4.4 It is, therefore, clear that new homes should be provided to accommodate those who work within the Borough. It is necessary for the housing requirement to reflect that.

Housing Distribution

Focus on Previously Developed Land

- 4.5 With regards to the distribution of housing, Policy DEV1 is clear that 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 SHLAA. These sources combine to total a minimum identified capacity of 11,785 new homes over the Plan period. This equates to 654 homes per year for the duration of the 18 year plan period. The majority of these sites are classified as brownfield land.

- 4.6 Firstly, our Client objects to the Council's approach to focus the majority of new development on brownfield land. A number of the identified allocations are considered unviable, or have other constraints such as flood risk. For example, the site at Causeway Park, Warrington, is identified within the SHLAA to be suitable for residential development with an indicative capacity of 59 dwellings. However, the site falls within Flood Zone 2, is currently in employment use and has issues with contaminated land. It is clear, therefore, there is a lack of evidence to support the deliverability of some sites identified within the SHLAA. Due to this uncertainty, it is clear that some SHLAA sites cannot make a contribution towards the Council's land supply as identified at Policy DEV1.
- 4.7 With this in mind, it is clear that the Council need to provide sufficient evidence for all of the proposed housing sites in order to inform an accurate view as to whether these sites are likely to deliver housing development within the Plan period. It remains our position that further housing allocations on greenfield land are required to ensure the Council are able to meet the housing requirement.
- 4.8 Our Client identifies two further issues with the Council's brownfield-first strategy, in terms of the realism of this being delivered. The first point is that the annual minimum need from the SHLAA sites greatly exceeds that which has been achieved in the last 5 years. It should be noted that the sites identified within the SHLAA are mainly previously developed land (PDL) as Green Belt land was not considered as suitable for inclusion (paragraph 2.19 of the SHLAA).
- 4.9 This is shown at Table 1 below, which confirms the quantum of homes delivered on previously developed land as taken from the Annual Monitoring Report of that year.

Monitoring Year	Homes on Previously Developed Land
2015/16	580
2016/17	509
2017/18	384
2018/19	511
2019/20	456

Table 1: Quantum of homes delivered on previously developed land by year

- 4.10 As evidenced above, the delivery fluctuates year on year, as would be expected, however the common trend is that the figure does not come close to reaching 654 homes, as required to meet DEV1. This is despite a lack of real alternatives available in terms of housing sites owing to the Green Belt constraints of the Borough severely limiting opportunities to build on undeveloped land.
- 4.11 The past trends of homes provided on PDL are an indicator that the Council is potentially over reliant on SHLAA sites to meet their housing requirement and as such, DEV1 does not result in a plan that meets the areas objectively assessed need for housing and is not deliverable over the plan period.
- 4.12 The second potential issue is that, of the locations identified as deliverable in the plan period, a significant number of these are large sites located within Warrington town centre.
- 4.13 We urge caution to the Council when relying on these Sites. Over 2,100 of the homes identified are only classified as suitable in the medium and longer term. None of these benefit from planning permission, and some are currently in active employment use, which leaves significant uncertainty regarding the ability of these sites to be delivered within the Plan period.
- 4.14 Furthermore, the Viability Assessment that informs the draft Local Plan concludes that the majority of sites identified within lower value areas, in the Town Centre for example, have viability issues which may affect their delivery. As such, this raises the possibility that their delivery will need to be supported by public monies and heightens the uncertainty associated with their delivery.
- 4.15 The emphasis on the town centre to deliver a significant proportion of the housing requirement therefore carries significant risk associated with the uncertainty surrounding the deliverability of key sites. Based on the evidence available, it is, therefore, our position that the draft Local Plan is not deliverable in this regard.

Fiddlers Ferry

- 4.16 As identified in Section 2 of these representations, the Updated Local Plan identifies a new allocation at Fiddlers Ferry to deliver a total of 1,310 homes over the plan period. Although our Client supports the removal of this Site from the Green Belt, it remains our position that the site needs to be adequately assessed before it is allocated within the Local Plan. There is currently a lack of evidence to support the allocation of the Fiddlers

Ferry site, and there is no justification to confirm that it is capable of coming forward. It is, therefore, our position that the Fiddlers Ferry site cannot make a contribution towards the housing land supply at this time.

4.17 As such, it is clear that the Local Plan needs to increase the number of green field and Green Belt sites in higher value areas, which offer much more certainty of delivery within the plan period. Our Client's Site at Mill Lane in Lymm is available and able to quickly deliver homes within the short to medium term and we, therefore, promote this as a site to be allocated for housing delivery within the Local Plan.

4.18 Policy DEV1 proposes the delivery of 801 homes through Green Belt release in the outlying settlements of Croft (75), Culcheth (200), Hollins Green (90), Lymm (306), and Winwick (130). As above, our Client agrees that, based on the established need for housing and associated housing requirement, there is a need for development to be accommodated in these outlying settlements. Given the aforementioned uncertainty associated with delivering the scale of housing proposed in lower value areas on PDL, additional land is required to be allocated within these outlying settlement to add security to the housing land supply within the Local Plan.

4.19 Our Client's Site in Lymm has the potential to provide an additional allocation in a location that is in accordance with the proposed spatial strategy of the Local Plan.

Stepped Housing Requirement

4.20 The Council has stated that a stepped requirement will be used so that in the first 5 years of the plan period the housing requirement is 678 homes per annum. This increases to 870 homes per annum between the years 6 – 18.

4.21 The Council's justification for this as set out at paragraph 4.1.19 suggests that the stepped requirement is a direct response to the SHLAA sites and allocation in the trajectory, rather than offering a specific evidence based justification.

4.22 Paragraph 69 of the NPPF requires local planning authorities to consider a good mix of sites that can deliver across the plan period. In stating that a stepped requirement is needed, the Council is effectively acknowledging that this requirement to achieve a range of sites has not been met.

- 4.23 The PPG (Paragraph: 021 Reference ID: 68-021-20190722) is clear that a stepped requirement may be appropriate in certain circumstances, however, evidence is required to support this approach and it is not unduly delaying meeting development needs. It is our position that the Council has not produced clear evidence to justify this and therefore the stepped requirement is not justified.
- 4.24 The Council's most up-to-date five year housing land supply position confirms that, as of 1st April 2019, the Council only had a 3.7 year supply of housing land. Given that the Council have previously been unable to demonstrate a five year supply of housing, it is clear that a stepped approach to housing delivery is not justified.
- 4.25 Whilst the Council's justification of a stepped requirement currently relates to the lead in time associated with the delivery of larger Green Belt release sites, it should be noted that at this juncture Anwyl Land do not object to the allocation of such sites as they will play a key role in meeting the housing requirement.
- 4.26 Policy DEV1 states that the Council will only give due consideration to a review or partial review of the Local Plan, this is not a firm commitment. It is necessary to include a mechanism to ensure that the Council can demonstrate and maintain a deliverable 5 year housing land supply throughout the Plan period.
- 4.27 As such, it is considered that a partial review of the Local Plan may be necessary, should the Council experience a period of under-delivery (such as 3 years). This will provide greater certainty to developers in relation to the circumstances when further land release will be required. This should also be applicable to the overall housing requirement figure rather than the phased trajectory currently proposed.
- 4.28 The approach as drafted is contrary to Paragraphs 31 to 33 of the NPPF, which clearly set out the need for Local Plans to be underpinned by relevant and up-to-date evidence, and be reviewed every 5 years.
- 4.29 The justification to Policy DEV1 states that it is the Council's belief that the housing development requirements beyond the plan period (2038 to 2050) are adequately met by various sources and therefore no additional allocations need to be made for this purpose.

- 4.30 The matter of meeting development needs beyond the plan period is particularly pertinent in the case of the Warrington Local Plan as it is rightly proposing the alteration of Green Belt boundaries. 140 of the NPPF is clear that the intention of the Green belt is permanence in the long term and therefore changes should be able to endure beyond the Plan period. Paragraph 143 goes on to state that it may be necessary to identify safeguarded land, to be eventually removed from the Green Belt in order to meet long-term need.
- 4.31 We, therefore, urge caution to the Council in relation to their assumptions that the Green Belt boundaries will not need to be altered again beyond the Plan period.
- 4.32 The annual need for housing set out by the Council is 605 homes. This is the annual average of household growth between 2028 and 2038 as taken from the 2014 based household projections. As such, it is the starting point for establishing the result of the Standard Method. The Council is working on the assumption that, owing to the delivery of homes through the Local Plan, the affordability of housing will no longer be a significant issue in 2038. While the rationale behind this is understood, it is at best an optimistic, and at worse a naïve, position to take.
- 4.33 This is amplified by the fact that the housing requirement for the Local Plan is already the minimum acceptable level and does not account for any additional economic growth. This is not, therefore, an ambitious target where if achieved will mark a step change in the housing market of the Borough.
- 4.34 It is considered that a more rational and straight forward approach would be to 'roll over' the current requirement for an additional 12 years, which creates a more realistic scenario. If this approach was progressed, the need for housing over the 12 year period will rise from 7,260 to 9,792, totalling an increase of 2,532.
- 4.35 This constitutes a significant uplift and means that, even if the Council's proposed supply of 7,487 is taken as read, there would be a deficit of 2,305 over the 12 year period.
- 4.36 Concerns also exist in relation to the Council's indicative supply as identified in Table 2 of the WLP.
- 4.37 The source of the additional supply within Plan for flexibility figure of 1,948 is unknown at the current time. The 10% flexibility set out in Table 1 which sets out the land

requirements for the plan period shows 1,469. This is 479 homes different, and it is not currently clear where this additional supply is coming from. The Council will need to provide evidence to underpin this figure.

- 4.38 The suitability of using the flexibility in the supply for the plan period to meet the housing needs beyond it is also questioned. The contingency has been applied in order to allow for the slippage and non-delivery of some sites. As such, by definition some of this will be required to make up for the resulting shortfall in the plan period.
- 4.39 While the Council acknowledge that the availability of brownfield land suitable for development is likely to reduce after the plan period, a figure of 3,024 (252 per annum over 12 years) homes is proposed for the supply. This does not appear to be based on any current evidence and the Council will need to justify the use of this figure.
- 4.40 Therefore, it is clear that owing to a higher requirement being applied and issues with the identified supply, there is a significant shortfall in supply beyond the plan period. The constraints of the Borough mean that this is highly likely to require further Green Belt release.
- 4.41 The allocation, or as a minimum safeguarding, of suitable Green Belt sites is therefore required to ensure compliance with the NPPF and ensure that the Green Belt boundaries established by the WLP have a sense of permanence. We, therefore, maintain that our Client's Site at Mill Lane is a suitable option for safeguarding or allocation.
- 4.42 To summarise, we conclude that Policy DEV1 has not been positively prepared given the heavy reliance on Town Centre brownfield land, which creates a significant risk of development need going unmet. To remediate this, we suggest that additional sites are allocated on land adjacent to outlying settlements. This should also include a mix of greenfield, Green Belt and brownfield land. Furthermore, the Policy is contrary to Paragraph 69 of the NPPF and PPG, due to the use of a stepped requirement without appropriate justification.

Policy DEV2 – Meeting Housing Needs

- 4.43 Policy DEV2 sets out the Council's strategic for meeting housing needs across the Borough, including affordable housing, housing for older people, self and custom build

housing and houses in multiple occupation. The Policy also confirms the required type and tenure and housing standards.

- 4.44 With regards to affordable housing, Point 10 of the Policy states that affordable housing should be provided on-site and only in exceptional circumstances where the nature of the site is deemed unsuitable for affordable housing will the Council accept a commuted sum in lieu of on-site provision. This approach is contrary to Paragraph 63 of the NPPF which allows affordable housing to be delivered off site where a financial contribution can be robustly justified. As such, this section of the Policy should be amended to reflect and ensure compliance with the NPPF.
- 4.45 Whilst the Council's Local Plan Viability Assessment (2021), prepared by Cushman and Wakefield, identifies support for the proposed affordable housing provision, it is noted that there are instances where the Council will need to provide flexibility in their policies and have regard to individual site viability, and where a case is made, to adjust the amount of affordable housing provision.
- 4.46 Part 16 of the Policy states that the Council will seek, as a minimum, all homes to be provided to Building Regulation Standard M4(2) 'Accessible and Adaptable dwellings', where it is viable and technically possible to do so. Although our Client acknowledges that there is a need for accessible housing within new development to meet the current and projected needs of an ageing population, it is our position that a 100% requirement has not been justified within the Local Housing Needs Assessment. This is also the case for justifying the need for 10% of homes to be M4(3) standard.
- 4.47 Whilst having adaptable and accessible dwellings available to allow older people to stay in their homes required is sensible, the associated need to downsize is a fundamental part of the housing market and opens opportunities for families and younger people to access the larger homes they require. It should also be noted that the current wording of the requirement for housing for older people is unclear, as there is no definition of what this is.
- 4.48 Whilst the explanator text at paragraph 4.1.61 refers to dwellings at M4(2) and/or M4(3) standard having a positive impact on meeting the needs of older people in terms of suitable housing available during the plan period, it is not clear if the requirement to accommodate housing for older people means that development of 10 or more dwellings will only need to accommodate development at these standards, which is required by

the Optional Standards section of the policy regardless. If so, this represents unnecessary repetition and is not compliant with Paragraph 16 of the NPPF.

- 4.49 In addition to the above, the Policy must ensure that it does not place undue or onerous burdens on developers. We urge caution from the Council in seeking to introduce building standards which are properly controlled by other legislation outside of the planning system; historic measures such as Code for Sustainable Homes have been shown to be impractical to enforce through the planning process.
- 4.50 We stress that there is no impetus for the development industry to avoid such measures. Development is already required to adhere to the Building Regulations 2010. It is important for an effective planning system to avoid the duplication of other legislation and avoid unnecessary complications within the planning system. For practical reasons of assessment alone, it is not considered desirable for planning departments to require a process of building regulation assessment as part of a planning application process.
- 4.51 The explanatory text also references sheltered housing and Care Homes. However, neither of these would be suitable to accommodate on a smaller Site. The Council need to clarify the requirements of this policy so that it is clear what is to be provided, and at what quantity.
- 4.52 In terms of self and custom build housing, the Council's policy is unclear as to how a sufficient supply of plots will be identified. Whilst it is accepted that the site-specific allocation of self and custom build to allocations over a certain size exists, this can lead to slower delivery rates of housing and the need for complex 'claw back mechanisms' for the land if there is not sufficient demand for plots. An alternative to this would be the allocation of smaller sites exclusively for self and custom build homes.
- 4.53 To summarise, it is not considered that Policy DEV2 is justified, given that there is no evidence presented to justify the requirement for 100% of homes being built to M4(2) standard. Elements of this Policy are also unclear and ambiguous, and are therefore not in accordance with Paragraph 16 of the NPPF. More clarity should be provided in terms of what is meant by 'housing for older people' and how this can be accommodated within developments of 10 or more homes.

Policy GB1 – Green Belt

- 4.54 Policy GB1 confirms that the Council will maintain the general extent of the Borough's Green Belt throughout the Plan period and to at least 2050. It also sets out a number of Sites which will be removed from the Green Belt and which settlements are excluded from the Green Belt.
- 4.55 The NPPF sets out at Paragraph 140 that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. It is clear that the Council are able to establish exceptional circumstances for Green Belt release across the Borough.
- 4.56 The Council has adopted a housing requirement that seeks to meet the bare minimum acceptable under the NPPF. The Council's SHLAA has fully evaluated available sites in the Borough and established the capacity for housing on non-Green Belt sites. As stated earlier, this capacity is optimistic given delivery constraints, particularly around the Town Centre, and so there is a high possibility that this capacity may be lower.
- 4.57 However, even against the lowest housing requirement possible, which takes no account of possible economic growth, and an inflated housing land supply in the SHLAA, there remains a deficit of 2,903 homes. This deficit is against the local housing need / housing requirement alone and without any additional flexibility to take account of potential slippage and to allow for market choice.
- 4.58 If the 10% increase proposed by the Council to allow for flexibility is added to the requirement, then the deficit is 4,372 homes. This is a significant shortfall in the housing land supply across the plan period and meeting this need for affordable housing provides exceptional circumstances for Green Belt release.
- 4.59 As drafted, the Policy GB1 would set a Green Belt boundary which is incapable of meeting the need for housing and as such cannot be considered to be positively prepared. As stated in reference to Policy DEV1, the Council's assumptions that underpin the housing need and supply beyond the plan period are not adequately justified and it is likely that additional allocations or safeguarded sites will be required to ensure that Paragraph 140 of the NPPF is met.

- 4.60 The boundaries of the Green Belt as currently proposed are therefore unsound as they are not positive prepared and do not meet national policy. This can be rectified by ensuring that sufficient land is released from the Green Belt in the form of allocations, or safeguarded land, to ensure that these needs are met.
- 4.61 In terms of provision 11 of the Policy, which relates to compensatory improvements, the Policy is currently unclear and ambiguous as to which developments will have to provide these improvements to the remaining Green Belt.
- 4.62 It is assumed that this would only relate to development that results in land being released from the Green Belt, in accordance with Paragraph 142 of the NPPF. The policy should be rewritten to make it explicit that this provision only relates to development resulting in a loss of Green Belt land, and not all development proposals. The suggested wording for the updated Policy is as follows:
- "Where development proposals result in land being removed from the Green Belt, or are part of an allocation on land formerly in the Green Belt, a scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt will be required to be provided. Financial contributions will be considered where this would help to ensure that the benefits of compensatory improvements can be maximised by providing them in the most appropriate location."*
- 4.63 To summarise, evidence suggests that the town centre redevelopment is unviable and there is therefore a significant risk that this will not come forward. As such, it is imperative for the Local Plan to allocate additional sites to meet the needs of the Borough. Currently, the Green Belt boundary does not allow for this development and is likely to fail to meet the NPPF requirement at Paragraph 140 to endure beyond the Plan period.
- 4.64 It is considered that our Client's Site at Mill Lane will make a valuable contribution to the housing land supply and will assist in meeting the Council's housing requirement. We therefore recommend that it is removed from the Green Belt and allocated for housing development within the Local Plan. Further justification for this position is set out at Section 6 of these representations.

5.0 LOCAL PLAN: OTHER RELEVANT POLICIES

5.1 This Section provides our Client's comments on other relevant policies within the Draft Local Plan. These policies include:

- Policy INF1 – Sustainable Travel and Transport
- Policy INF5 – Delivering Infrastructure
- Policy ENV2 – Flood Risk and Water Management
- Policy ENV7 – Renewable Energy and Low Carbon Energy Development

5.2 Our comments on these policies are discussed in turn below.

Policy INF1 – Sustainable Travel and Transport

5.3 Policy INF1 confirms the Council's objective for improving the safety and efficiency of the transport network, and how they expect development to achieve this.

5.4 The text associated with the Policy is extremely lengthy and it is our Client's position that this has resulted in a failure of the Policy to deliver its actual requirements. The Policy seeks to ensure that development is located within sustainable and accessible locations; priority is given to walking, cycling and public transport and that management measures such as reducing the number of cars and trip rates are proposed are utilised and that infrastructure for plug-in cars and low emission vehicles are utilised. Our Client is supportive of the Plan's policy in respect of the need to provide a safe and efficient highway network.

5.5 Paragraph 111 of the NPPF is clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This should be reflected in the Local Plan.

5.6 As drafted, the current wording of part 1.g) of the Policy is not aligned with the NPPF and is considered to be unsound, owing to a conflict with national policy. Paragraph 111 of the NPPF is clear that the development should only be prevented or refused on highways grounds if the residual cumulative impacts on the road network would be severe.

- 5.7 The current wording of the Policy implies that any adverse impact on the local community owing to an increase in traffic would not be acceptable. This is contrary to the NPPF. As such, we suggest that the working of this part of the policies should be amended as follows:

*"Ensure traffic generated by development is appropriate to the type and nature of the routes available and that ~~there is no adverse impact on the local community~~ **the cumulative residual impact associated with it is not severe.**"*

- 5.8 It is also unclear why the Council has chosen to include (4) protect future re-use of disused rail corridors; (5) improving freight transport provision; and (6) sustainable transport of minerals and waste within the policy and it is considered that it would be more appropriate for these to be contained within a separate policy rather than Policy INF1.

Policy INF5 – Delivering Infrastructure

- 5.9 Policy INF5 refers to the need for development to provide or contribute towards the provision of infrastructure needed to support it, and the Council will seek planning obligations where development creates a requirement for additional or improved serviced and/or address the off-site impact. Where new infrastructure is required to support a development, the policy is clear that this must be operational no later than the appropriate phase of development for which its needed and will be sought on a case by case basis. Potential contributions / infrastructure includes affordable housing, public health, biodiversity, open space infrastructure and education. The Policy states that viability will only be considered at the planning application stage where required planning obligations are in addition to those considered as part of the Local Plan Viability Appraisal, or where there are exceptional site-specific viability issues not considered as part of this Appraisal.
- 5.10 It is noted that CIL is not yet in place in Warrington. The emerging Local Plan indicates in Para 3.3.34 that the Council will consider CIL immediately following the adoption of the Local Plan. However, Policy INF5 does not specify when or if this will be introduced, rather the supporting text refers to "should the Council introduce it". Additionally, no reference is made in the IDP or Viability Appraisal to the introduction of CIL; accordingly, clarification on the Council's approach to CIL is required given that this will impact on the contributions and infrastructure required through the IDP. Clarification of the Council's intentions to the delivery of CIL is required.

- 5.11 In terms of the Infrastructure Development Plan, which was produced in 2019, a number of proposed works are assigned indicative costs and funding, however, a number of schemes, such as the M62 capacity and junction improvements, and M6 capacity improvements, whilst assigned to be delivered through Policy INF1 do not.
- 5.12 As confirmed within our previous representations, in the instances where indicative costs have been provided, and funding is confirmed, there are in a number of instances substantial funding gaps, such as in relation to Flood Risk Management, which has an indicative cost of over £14.3 million but only £500,000 funding has been confirmed. Overall there is an identified funding gap of over £13.8 million which the Council envisages will be delivered by the Environment Agency, United Utilities and WBC contributions. There is no guarantee of this source of supply, particularly when public body resources are being stretched. Accordingly, much greater certainty and evidence needs to be provided prior to the adoption of the Local Plan. Additionally, it is noted that out of circa 160 infrastructure projects and elements to be delivered, there is in excess of a £1.54 billion funding gap required to bring forward these identified schemes; it is unclear how this gap will be met. This raises significant concerns over the deliverability of the Plan and its infrastructure delivery.
- 5.13 In light of the above, Paragraph 57 of the NPPF states that Planning Obligations should only be sought where they meet all the following tests:
- a) Necessary to make development acceptable in planning terms;
 - b) Directly related to the development; and
 - c) Fairly and reasonably related in scale and kind to the development.
- 5.14 Furthermore, Paragraph 58 of the NPPF states that it is for “the applicant to demonstrate whether particularly circumstances justify the need for a viability assessment at the application stage”. The policy as drafted does not make an allowance for this. The policy should also ensure that the IDP is clear as to what will be required to be delivered from each scheme, and the confirmed costs for this, to ensure certainty for the developer, and compliance with PPG Paragraph 005 (Ref ID: 10-005-20140306) and PPG Paragraph 007 (Ref: ID: 10-007-20140306) in relation to a sound viability evidence base, and the costs for the developer and the need to ensure that the cumulative impact of the scheme does not result in schemes becoming unviable. As such, it is our Client’s view that the Policy as drafted and the IDP is contrary to the NPPF and the PPG and cannot be considered sound.

Policy ENV2 – Flood Risk and Water Management

- 5.15 Policy ENV2 provides guidance on how development should respond to flood risk and water management issues across the Borough. It is considered that the General Principles of the Policy are in general accordance with Section 14 of the NPPF and are therefore sound.
- 5.16 However, to meet the requirements of paragraph 16 of the NPPF, some elements of the Policy need further refinement. Points 10, 11, 12 and 13 all serve to require developments to use SuDS wherever possible and to follow the drainage hierarchy set out in the PPG (Paragraph: 080 Reference ID: 7-080-20150323). This is an unnecessary level of repetition and it is considered that these paragraphs can be merged and simplified to aid clarity

Policy ENV7 - Renewable Energy and Low Carbon Energy Development

- 5.17** Policy ENV7 requires all major development in locations outside of strategic allocations will be required to meet at least 10% of their energy needs from renewable and/or other low carbon energy sources to reduce their carbon emissions by at least 10% when measured against Building Regulation (Part L) requirements.
- 5.18 Firstly, it is our position that strategic allocations should also seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems.
- 5.19 Changes to building regulations implemented from 2021 will require a 31% reduction from current requirements. Furthermore, the Future Homes Standard will require a 75% reduction from 2025.
- 5.20 As such, the inclusion of a requirement as policy is therefore superfluous and goes against the Government's intention that energy efficiency standards should be set through Building Regulations. This will ensure standardisation across the country and the ability for markets of scale to develop in terms of carbon cutting technologies that can be applied more efficiently. Applying bespoke planning policies that vary by area will not achieve this.
- 5.21 We, therefore, urge caution from the Council in seeking to introduce building standards which are properly controlled by other legislation outside of the planning system and we

stress that there is no impetus for the development industry to avoid providing low carbon energy development. It is important for an effective planning system to avoid the duplication of other legislation and avoid unnecessary complications within the planning system.

- 5.22 Furthermore, the rigid wording of Policy ENV7 in regards to decentralised energy networks currently prohibits the update of newer technologies and should be revisited. Heat networks are one option when looking to lower carbon emissions when generating heat. As existing technologies become more affordable, such as air source heat pumps, and new technologies are developed, better options may become available to lower the carbon requirement of heating more quickly. It should also be noted that as the national grid continues to decarbonise, the need to decentralise networks to ensure the use of renewable energy will be lessened.
- 5.23 With regards to the above, we suggest that the Policy is amended to remove sections of the policy requiring reductions to carbon emissions beyond Building Regulation (Part L) requirements, as this is already covered by the new Building Regulations, which will be in place by the time the Local Plan is adopted.

6.0 LAND AT MILL LANE, LYMM

- 6.1 The previous Sections of these representations have confirmed our Client's position that the proposed housing allocations are not sufficient in meeting the identified housing need for the Borough and that further Green Belt release is required, particularly in the outlying settlements.
- 6.2 As such, this Section of the representations promote our Client's Site at Mill Lane as an appropriate housing allocation. Our Client has been actively promoting the Site for allocation through the Local Plan process. A Location Plan is attached at Appendix 1 for reference.
- 6.3 As set out in Section 4, whilst our Client supports in principle the need for the allocation of sites within outlying settlements to boost homes within the local area, it is clear that the amount of housing proposed within these outlying settlements is not sufficient to meet identified needs. Limited justification has been provided by the Council to determine the appropriate level of development which is required, and the reasoning behind the reduction in housing requirement.
- 6.4 The Draft Local Plan currently proposes two allocated sites in Lymm; Pool Lane/Warrington Road (170 dwellings); and Rushgreen Road (136 dwellings). Within the Council's identification of these allocations, it is considered that the sites make a weak to moderate contribution, which is akin to the Council's assessment of our Client's Site. As such, it is unclear as to why these sites have been selected over our clients Site, which for the reasons set out in our 2017 and 2019 representations, performs a weak contribution to the Green belt purposes and is therefore considered to be an appropriate site for allocation.
- 6.5 As detailed at Section 1 of these representations, the Site is located to the east of Outrightington in Lymm, and is comprised of existing Grade 2 and Grade 3a agricultural land adjoined to the existing urban area. The Site is located between the Transpennine Trail in the north and Bridgewater Canal in the south. The Site is contained on all sides by existing prominent features, including extensive build development to the north and the west.
- 6.6 The Site, therefore, represents a sustainable location for housing development. The Site holds the potential to accommodate between 350 and 400 new family homes, as well as

a Care/Extra Care Facility and self-build plots. The Site would, therefore, make a significant contribution to the housing supply needs of Lymm and the wider Borough, responding to a diverse range of housing need.

6.7 With regards to deliverability, our previous representations included a Development Framework, which provided an initial overview of the Site's opportunities and constraints, and confirmed that the Site is in principle developable for housing. The Site is considered capable of delivery in full within the Plan period, and would also make a contribution towards the five-year housing land supply.

6.8 Furthermore, a Landscape and Visual Assessment and Green Belt Appraisal Report and Traffic Impact Note were all prepared and submitted in support of our previous representations. These documents confirmed that the Site is suitable for residential development and would not have a detrimental impact on the surrounding landscape and visual character, or highway network.

6.9 It is considered that the release and allocation of Land at Mill Lane for residential development will provide a range of far-reaching benefits, including:

- Delivery of a diverse range of house types and sizes, developed to the highest quality design standards;
- Delivery of affordable homes of appropriate mix and tenure, to be pepper-potted across the Site and undisguisable in terms of design and quality of materials.
- Opportunity for Care/Extra Care facilities, and self-build plots, assisting the Council to meet required needs.
- Diversification of sites identified by the Local Plan providing for increased market choice and boosting housing land supply;
- Contribution to the short-term housing land supply requirements of the Local Plan;
- Accessible location to the centre of Lymm, with close proximity to existing public transport routes, minimising reliance on travel by car;
- Land reserved for the delivery of a new school and nursery;
- Opportunity to provide generous levels of public open space, including a Multi-use Games Area (MUGA), child's playspace, and allotments;
- Provision of footpath and cycleway connections through the site to enhance the connectivity of the wider area to sources of recreation;

- Strengthening of the settlement edge and boundary of the Green Belt ensuring the durability of this boundary;
- Support to existing services, facilities and businesses within Lymm due to increased spend and use from new residents;
- Direct and indirect support to construction sector jobs during the build programme. Support to care worker jobs following completion of development;
- Support to skills in design, project management and construction for residents of self-build plots;
- Annual contributions to the local economy from economically active residents of the site;
- Annual Council tax contributions; and
- New Homes Bonus to enhance public funds and supporting the delivery of wider infrastructure needs.

Summary

- 6.10 This Section of the representations have confirmed that our Client's Site at Mill Lane, Lymm is appropriate for residential development. The Site is considered capable of delivery in full within the Plan period and would make a contribution towards the Council's five-year housing land supply. It's allocation would diversify the existing supply in terms of scale and location of allocation, enhancing the overall deliverability of the Plan by increasing market choice and competition.
- 6.11 The Site is not subject to any physical constraints that would prevent or unduly limit the potential for the residential development of the Site. The Site relates well to the existing urban edge of Lymm, and is surrounded on all sides by existing easily definable features. The Site is considered by the applicant to fulfil a weak role within the Green Belt and as such should not be kept permanently open from development. A new stronger boundary along Mill Lane can be created which will prolong the Green Belt in this location.
- 6.12 Based on the above, our Client considers that the Council should identify the Site for circa 400 dwellings, plus 6 acres of over 55's C2/Extra Care provision through the Warrington Local Plan.

7.0 CONCLUSIONS

- 7.1 These representations have been produced by Barton Willmore on behalf of Anwyl Land, in relation to the Warrington Updated Proposed Submission Version Local Plan 2021 – 2038 consultation.
- 7.2 These representations have identified a number of technical issues of soundness in relation to the strategic planning policies, which need to be addressed. In particular, these representations have set out our Client’s concerns with the overall level of growth and the spatial strategy set out in the emerging Local Plan, which is not considered to be sufficient to ensure that future growth needs are met across the district as a whole.
- 7.3 In particular, the Council are relying on the delivery of brownfield sites and the newly allocated Fiddlers Ferry site to meet their housing requirement. These representations have confirmed that there are a number of constraints associated with delivering these sites, and further evidence and justification is needed to confirm that they are capable of coming forward and, therefore, able to make a contribution towards the housing land supply.
- 7.4 It is, therefore, our position that the proposed housing allocations are not currently sufficient in meeting the identified housing need for the Borough and that further Green Belt release is required, particularly in the outlying settlements.
- 7.5 As such, these representations have identified our Client’s land interests at Mill Lane in Lymm as an appropriate location for Green Belt release and would make a significant contribution in assisting the Council to meet its housing need.
- 7.6 We would be grateful if you would acknowledge these representations as duly-made and keep us informed as to the next stage of the Local Plan. Our Client also reserved the