

15 November 2021

Delivered via email

Local Plan
Planning Policy and Programmes
Growth Directorate
Warrington Borough Council
East Annexe
Town Hall
Sankey Street
Warrington
WA1 1HU

Dear Sirs

**WARRINGTON UPDATED PROPOSED SUBMISSION VERSION LOCAL PLAN 2021
PEEM3056**

On behalf of my client Peel L&P Holdings (UK) Limited (“Peel”) I have pleasure in enclosing representations to the Warrington Updated Proposed Submission Version Local Plan 2021 (PSLP 2021).

This representation forms one of two submitted by Peel L&P Holdings (UK) Limited with the second being made jointly by Peel L&P Holdings (UK) and Peel Ports. Peel Ports is not party to the representation to which this letter and the associated enclosures relate.

Peel’s representations relate principally to the following policies of the PSLP 2021:

- Policy DEV1: Housing delivery
- Policy DEV2: Meeting Warrington’s housing needs
- Policy DEV4: Economic growth and development
- Policy TC1: Town Centre and Surrounding Area
- Policy GB1: Warrington’s Green Belt
- Policy INF5: Delivering infrastructure
- Policy MD1: Warrington Waterfront
- Policy MD2: South East Warrington Urban Extension
- Policy MD 5: Thelwall Heys
- Policy OS1: Croft

[REDACTED]
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[REDACTED]
[REDACTED]

- Policy OS2: Culcheth
- Policy OS3: Hollins Green
- Policy OS4 Lymm – Pool Lane/Warrington Road
- Policy OS5: Lymm – Rushgreen Road

Peel's representations are set out across the following documents:

1) Strategic papers:

- Paper 1: Main representation
- Paper 2: Technical review of the proposed housing requirement
- Paper 3: The housing land supply
- Paper 4: The Outlying Settlements

2) Development Prospectuses and a full technical evidence base in relation to the following residential development opportunities:

- The South West Urban Extension
- Land at Manchester Road Hollins Green
- Land north of Culcheth
- Land at Rushgreen Road Lymm
- Land at Lady Lane Croft
- Land north west of Croft

This body of work demonstrates that the above sites represent sustainable and deliverable development opportunities.

3) Completed response pro-formas in respect of each of the aforementioned policies

In combination, these representations set out Peel's evidenced position that the PSLP 2021 is unsound in its present form. On review of the Local Plan and its evidence base it is apparent that the PSLP 2021:

- a) does not seek to meet the objectively assessed housing or employment development needs over the plan period;
- b) is reliant on a supply of housing sites which are not developable to the level assumed by the Council;
- c) has failed to make proper provision for meeting development needs beyond the plan period;
- d) is based on a deficient and inconsistent appraisal of options for the release of Green Belt land for housing development adjacent to the main urban area and in the Outlying Settlements;
- e) proposes Green Belt sites for release and development allocation adjacent to the main urban area which are not appropriate relative to the reasonable alternatives available;
- f) proposes Green Belt sites for release development allocation in a number of Outlying Settlements which are not appropriate relative to the reasonable alternatives available.

The full extent of unsoundness and corrective steps needed to ensure the PSLP 2021 is able to proceed on a sound basis is provided in section 2 of Paper 1. In summary, the above points place the PSLP 2021 in conflict with key parts of the National Planning Policy Framework (NPPF) including paragraphs 11a, 20, 23, 60, 68 and 140 and means that the plan does not satisfy any of the four tests of soundness.

Soundness can be partly corrected through identifying additional land for both housing and employment development to meet needs during the plan period and safeguarding land to meet needs beyond the plan period. This will require land to be released from the Green Belt for these purposes.

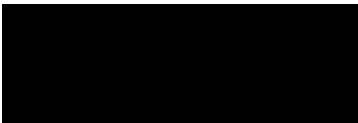
In the context of the points raised, and as part of the response to address the points of unsoundness, the allocation referred to as the South West Urban Extension (SWUE) in the PSLP 2019 (Policy MD3) should be reinstated. This reflects that it represents the most sustainable site option in meeting the need for residential development on the edge of Warrington urban area.

Five of the six aforementioned sites in the Outlying Settlements (excluding North West Croft) should also be allocated for development in accordance with proposals set out in this representation (plan period allocations and safeguarding) reflecting that they represent the most sustainable sites to meet the needs of the respective settlements during the plan period and beyond relative to other candidate sites. A further site, known as Statham Meadows, should be allocated for employment or mixed-commercial development.

Peel's representations raise a number of matters of strategic importance to the soundness of the Local Plan. It therefore intends to actively engage in the Examination of the Local Plan, including participation in hearing sessions relevant to the policies above.

I trust that these representations will be taken into account in the progression of the Local Plan.

Yours faithfully



Andrew Bickerdike
Director



Enc.

Cc. Richard Knight – Peel

Charlotte Ryan – Peel

Richard Sagar – Walker Morris

Josh Kitson – Walker Morris