



# **Representations to the Updated Warrington Proposed Submission Version Local Plan 2021**

Land North of Manchester Road / A57, Hollins Green

On behalf of Richborough Estates Group Ltd.  
November 2021

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(2019)**

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## 1. INTRODUCTION

- 1.1 These representations have been prepared by Asteer Planning LLP (“Asteer Planning”) on behalf of Richborough Estates Group Ltd (“Richborough Estates”) and refer to land controlled by Richborough Estates at Land North of Manchester Road / A57, Hollins Green as shown edged red on the Site Location Plan at **Appendix 1**. The site is proposed for Green Belt release under Draft Policy GB1 and a housing allocation under Draft Policy OS3<sup>1</sup> of the updated Warrington Proposed Submission Version Local Plan 2021 (“WPSBLP”).
- 1.2 Richborough Estates have promoted the site throughout the local plan process and submitted detailed representations including a Development Statement to the previous Warrington Proposed Submission Version Local Plan consultation which took place in Summer 2019 (enclosed at **Appendix 2**). The Development Statement set out the case for the removal of the site from the Green Belt and confirms Richborough Estates’ commitment to bringing the site forward for residential development in line with the objectives of Draft Policy OS3.
- 1.3 These representations build on the previous representations made on behalf of Richborough Estates by Nexus Planning (July 2017) and Avison Young (June 2019) and take into account the changes to the WPSBLP since the last round of consultation. These representations demonstrate that:
- i. The site represents a logical and wholly appropriate extension to the existing urban area of Hollins Green;
  - ii. The site is self-contained and has strong physical boundaries, with Manchester Road/A57 to the south-east and existing housing to the north-east and north-west. The western, south-western and south-eastern boundaries of the site will be reinforced through a well- designed landscape scheme;
  - iii. The site makes a weak contribution to the Green Belt when assessed against the five purposes that Green Belt serves as set out at paragraph 138 of the National Planning Policy Framework (“the Framework”);
  - iv. The site is situated in a sustainable location within close proximity to existing services and facilities in Hollins Green and employment opportunities at Birchwood;
  - v. The site can accommodate a high-quality residential development that integrates successfully with the existing built and natural environment and includes 1.18ha of public open space.

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<sup>1</sup> Please note that the site was previously referenced as OS4 in the 2019 WPSVLP.

- vi. The development of the site will allow for the provision of good quality cycling and walking routes within the site to connect the site to the wider footway network and existing public right of way to the north, promoting connectivity with the existing community;
- vii. The site can accommodate 100 dwellings at a density of 35 dwelling per hectare (“dph”);
- viii. The site is suitable, achievable and available for residential development in accordance with the Framework;
- ix. The site will deliver a range of housing tenures, types and sizes, including a mix of market and affordable housing to meet local needs; and
- x. There are no identified technical or environmental constraints that would prevent the delivery of housing on the site.

1.4 These representations also demonstrate that there are very special circumstances which exist to justify Warrington Borough Council’s proposal to remove land from the Green Belt and allocate it for housing to meet its housing requirements.

## **Background**

1.5 Following the High Court ruling in February 2015 which quashed the housing target in the adopted Warrington Local Plan Core Strategy (2014), Warrington Borough Council (“WBC”) sought to update its housing policies. It became clear that the Borough’s needs going forward could not be met without a full review of the adopted Plan.

1.6 In October 2016, the Council’s Executive Board agreed to commence the process of reviewing the existing Warrington Local Plan. Consultation on the Preferred Development Option (“PDO”) was undertaken between July and September 2017. Approximately 4,500 responses were received to the PDO consultation, a significant proportion of which related to the scale and location of development proposed and Green Belt release.

1.7 Consultation on the previous Proposed Submission Version Local Plan under regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 was held between April and June 2019. In total, around 3,200 responses were received, together with 2 petitions.

1.8 The vast majority of representations were made by Warrington residents and campaign groups, together with Parish Councils, MPs, Borough Councillors and community groups, concerned with the scale and location of development being proposed, in particular relating to the release of Green Belt land, and the impact of development on Warrington’s infrastructure.

- 1.9 The Council also received a significant number of representations from developers and landowners actively promoting sites through the Local Plan process. This includes those with land proposed to be allocated in the Plan and those whose land had not been proposed to be allocated. A small number of additional sites were also submitted for the Council's consideration.
- 1.10 Having reviewed the responses to the consultation, the Council concluded there was the need to undertake additional evidence base work. This was primarily to provide a greater understanding of the infrastructure required to support the development proposed in the Plan and to demonstrate that the required infrastructure was capable of being delivered in a timely manner.
- 1.11 In October 2020 the Council took the decision to pause work on the Local Plan. This was due to the economic and wider impacts of the COVID 19 pandemic and the Government's proposed amendments to the standard housing methodology.
- 1.12 Work re-commenced following confirmation of changes to the Government's housing methodology at the end of 2020. The Council updated its evidence base to re-establish Warrington's future development needs and subsequently re-assessed the Plan's spatial strategy and potential allocation sites.
- 1.13 Having undertaken this work and considered in detail the key issues raised from the previous consultation, the Council is proposing a number of significant changes from the previous Proposed Submission Version Local Plan (2019). A summary of those changes is provided below:
- 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, with the closure of the power station in March 2020 giving us the opportunity to bring the site into the allocation this time.

- 1.14 Given the scale of changes being proposed, the Council has prepared an updated WPSBLP for a six-week consultation between Monday 4 October 2021 and Monday 15 November 2021.
- 1.15 A new Local Development Scheme (“LDS”) was approved by the Council’s cabinet on 13 September 2021. The updated LDS sets out a detailed programme for the review of the Local Plan and confirms that once this consultation has ended, the Council will review all of the representations prior to submitting the Plan for Examination in Public (“EiP”) to be carried out by an Independent Inspector. It is anticipated that the earliest date for the EiP will be summer 2022 and that the Local Plan will be adopted by July 2023.

## 2. THE SITE

- 2.1 The Hollins Green site north of Manchester Road/ A57 comprises approximately 4.27 hectares of agricultural land immediately adjoining the south west edge of the settlement of Hollins Green. The site currently lies within designated Green Belt land.
- 2.2 The north-eastern boundary runs adjacent to the houses and gardens of Glen Close, Warburton View and Orchard Brow in Hollins Green. The north-western boundary runs adjacent to the cul-de- sac of Marsh Brook Close, areas of green amenity space and a small area of woodland. The south-western boundary of the site is formed by Marsh Brook and a buffer of trees, beyond which is the access road and buildings of Brook Farm. The south-eastern boundary is formed by the A57.
- 2.3 There is limited vegetation within the site, with the exception of trees along the south-western boundary along Marsh Brook, and a hedgerow between the site and the A57. There are no buildings located within the site. There is a public right of way (Rixton with Glazebrook 11) running parallel to the northern boundary of the site from Manchester Road/A57 to Marsh Brook Close.
- 2.4 Richborough Estates control the entirety of the land within the proposed housing allocation under draft Policy OS3. The land controlled by Richborough Estates is shown red on the Location Plan at **Appendix 1**. There was an additional parcel of land including within the previous version of the WSVLP which is located to the north west of Marsh Brook Close and is controlled by a third party. This land has planning permission for 4 detached dwellings under planning permission reference 2018/32900, which was granted on appeal in February 2019. It is understood that these dwellings will be self-build houses, which is a requirement of draft policy OS3. However, this parcel of land has since been removed from draft Policy OS3.

### 3. MEETING HOUSING NEEDS AND GREEN BELT RELEASE

#### Meeting Housing Needs

- 3.1 Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for.
- 3.2 At a national level, the Framework supports the Government's objective to significantly boost housing supply. 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 unnecessary delay (paragraph 60).
- 3.3 Paragraph 61 states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in the Planning Practice Guidance ("PPG") – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.
- 3.4 The PPG in relation to Housing Need Assessments 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 calculating a minimum annual local housing need figure which includes a four-step process; (1) setting the baseline, (2) adjustments to take account of affordability, (3) capping the level of any increase and (4) cities and urban centres uplift.
- 3.5 The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in area. It does not attempt to predict the impact that future Government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates (paragraph 10 of the PPG).
- 3.6 Warrington's Local Plan must ensure that sufficient homes are delivered to support the growth of Warrington over the plan period and that the type of homes delivered meet the needs of all the Borough's existing and future communities.
- 3.7 **Draft Objective W1** and **Draft Policy DEV1** of the WPSVLP sets out a clear and immediate need for housing in Warrington and identify a net minimum requirement for **14,688** new dwellings over an 18-



year delivery period (2021 – 2038), equivalent to 816 dwellings per annum (“dpa”). **Draft Policy DEV1** (‘Housing Delivery’) sets out the trajectory as to how the housing requirement will be delivered:

- 2021 to 2025 (first 5 years) – 678 homes per annum
- 2026 to 2038 (years 6-18) – 870 homes per annum

- 3.8 The target of 816 homes per annum over the Plan period has been established through the LPA’s Local Housing Needs Assessment (2021) and is in line with the Government’s standard method which is based on the 2014 household projections. Table 1 of the WPSVLP sets out the land requirements over the Plan period and includes provision for flexibility in addition to the overall land supply to allow for market choice and in the event that specific sites do not come forward. The Council has used a benchmark of 10% which it considers provides sufficient flexibility in the context of the Plan’s proposed housing land supply.
- 3.9 Draft Policy DEV1 seeks to deliver the majority of new homes within the existing main urban area of Warrington, the existing inset settlements and other sites identified in the Council’s Strategic Housing Land Availability Assessment (“SHLAA”).
- 3.10 Asteer Planning have not carried out an in-depth analysis of Warrington’s Urban Capacity Study 2019 (“UCS 2019”) or the methodology in which WBC have used to identify their urban capacity however a high-level review has been undertaken. The 2019 UCS indicated that Town Centre Masterplanning Areas will account for delivering 6,549 dwellings out of the 13,729 identified for the total urban capacity in Warrington. The Council has not updated the UCS as part of its review of evidence base documents.
- 3.11 Richborough raise concerns with the Council’s over reliance on town centre and other urban sites which are expected to deliver high density development on brownfield land which is likely to have viability and delivery issues.
- 3.12 The WPSVLP does also identify sites which will be removed from the Green Belt and allocated for residential development (totalling 4,020 to be delivered in the plan period) including:
- South East Warrington Urban Extension – minimum of 4,200 homes of which a minimum of 2,400 homes will be delivered in the Plan Period;
  - Land at Fiddlers Ferry – minimum of 1,760 homes of which 1,310 will be delivered in the plan period as part of a wider mixed use development;
  - Thelwall Heys – minimum of 310 homes will be delivered in the plan period.

- 3.13 Since the previous version of the WPSVLP, the Council has removed the South West Warrington Urban Extension (1,600 homes), Phipps Lane in Burtonwood Village (160 homes) and Massey Brook Lane in Lymm (60 homes) from the Plan. The Council has moved away from the Garden Suburb concept in South Warrington (4,200 homes in the plan period), and instead includes a new proposal for a South East Warrington Urban Extension, with a reduced allocation of 2,400 homes in the plan period.
- 3.14 Richborough Estates support the removal of some of the large sustainable extension sites but suggest that there still remains reliance on large sites to meet the Borough's housing need. Although some short-term delivery can be expected, these large sites at South East Warrington and Fiddlers Ferry will take several years to begin delivering significant numbers of houses due to the infrastructure required to facilitate such development.
- 3.15 In addition, Draft Policy MDA3.2 – Fiddlers Ferry, requires the landowner to prepare a comprehensive Development Framework for the site. The Development Framework will need to be agreed with the Council in advance of planning applications being submitted. The Development Framework will need to include (a) a comprehensive spatial masterplan for the entire development, (b) comprehensive infrastructure delivery strategy for the development and (c) an allocation wide approach to infrastructure funding. Our experience of such exercises is that there is a 1-2 year time lag for the preparation of such complex documents which means it could be 2025 before a Development Framework is agreed (based on adoption of the Local Plan in 2023 and 2028 before any housing is delivered. The Council's Strategic Housing Land Availability Assessment 2020 (Table 2.2) sets out a lead in time of 3 years for sites with outline planning permission over 150 dwellings.
- 3.16 Appendix 1 of the WPSVLP sets out the Housing Trajectory for Fiddler's Ferry and suggests that housing will be delivered from 2025 onwards and that 175 homes will be delivered on the northern parcel between 2025 and 2028. Richborough Estates object to the housing trajectory figures for Fiddlers Ferry because of the the timescales set out for the Local Plan adoption in the Council's LDS and the requirement for a Development Framework to be in place before any housing is delivered, which from our experience takes 1 – 2 years.
- 3.17 The Local Housing Needs Assessment (August 2021) sets out that the forecast delivery over the period 2021/22 – 2025/26 is 3,419 dwellings, a shortfall of 660 against an annual housing need figure of 816 dpa over the period (or a five year housing land supply "5YHLS" of 4.19 years). On account of falling short of the required number of homes, the 5YHLS is also subject to a 20% buffer. The Council would therefore need to an additional 1.81 years of supply (or 1,477 dwellings) to meet its housing land supply requirements in accordance with paragraph 74 of the Framework. Taking into account

the current pipeline (as evidenced in the SHLAA) means that the Council is not able to meet the 816 dpa target in the short, medium or longer term unless land is released from the Green Belt.

- 3.18 Paragraphs 4.1.15 – 4.1.22 of the WPSVLP sets out the housing distribution and trajectory but it is unclear whether the Council are stating that they will have a 5YHLS upon adoption of the plan. Therefore, Richborough reserve the right to comment on 5YHLS matters at EiP stage should further documents be published.
- 3.19 The Council is therefore proposing a “Stepped Housing Trajectory”. The housing requirement over the first 5 years will be 678 per dwellings annum. This will match deliverable supply over this period when the 20% buffer is added. The requirement over the remaining 13 years of the Plan, will increase to 870 per annum to ensure the overall requirement of 14,688 is met.
- 3.20 Richborough Estates raise concerns regarding the reliance on large sites and urban capacity sites which may have viability challenges and do not currently have planning permission. Richborough Estates advocates that additional small and medium sized sites, such as Hollins Green, should be allocated for housing because they are often built out relatively quickly and make an important contribution to meeting the housing requirement (paragraph 69 of the Framework), specifically the five year housing land supply. Given it is unclear whether the Council will be able to demonstrate a 5YHLS at the time of adoption, Richborough Estates reserve the right to comment on the 5YHLS position at the EiP stage.
- 3.21 The WPSVLP also identifies 801 homes to be delivered on allocated sites to be removed from the Green Belt adjacent to the following outlying settlements:
- a. Croft – minimum of 75 homes
  - b. Culcheth – minimum of 200 homes
  - c. Hollins Green – minimum of 90 homes
  - d. Lymm – minimum of 306 homes
  - e. Winwick – minimum of 130 homes
- 3.22 Richborough Estates strongly supports the proposed Green Belt release at Hollins Green in order to deliver new homes, in accordance with draft Policy DEV1 (4c).
- 3.23 Draft Policy DEV 1(5 and 6) relate to housing density. The policy requires at least 130 dwellings per hectare (“dph”) on sites that are within the defined Town Centre of Warrington, at least 50 dph on sites that are within the wider Town Masterplan area and sites adjacent to a district centre or in other

locations that are well served by frequent bus or train services; and at least 30 dph on other sites that are within the existing urban area. Densities of less 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of an area.

- 3.24 Richborough suggest that achieving the stated densities within the town and urban areas whilst overcoming technical and viability issues and complying with the nationally prescribed space standards, Building Regulation Standard M4(2) 'Accessible and Adaptable Dwellings' and M4(3) Wheelchair User Dwellings will be challenging. Richborough suggest that the site at Hollins Green could accommodate a higher density than the 30 dph stated in Draft Policy OS3. The Development Statement enclosed at Appendix 2 demonstrates that the site at Hollins Green can accommodate a minimum of 100 dwellings at 35 dph.
- 3.25 Draft Policy DEV 2 of the WPSVLP sets out the Borough's housing requirements in order to meet the identified need over the plan period. Draft Policy DEV 2 requires residential developments<sup>2</sup> to provide 20% affordable housing on sites within Inner Warrington, inclusive of the Town Centre and 30% affordable housing elsewhere in the Borough and on all greenfield sites irrespective of their location. Where 30% affordable housing provision is made, affordable home ownership should account for one third of the total affordable housing units, with two thirds being affordable housing for rent.
- 3.26 Richborough Estates do not object to the principle of draft Policy DEV 2, but would like to make the following comments:
- i. Richborough Estates object to DEV 2 (14) which requires all dwellings to have an appropriate outdoor amenity space. The policy is entirely subjective, is not clear or precise and is not based on proportionate evidence. On this basis DEV2 (14) is not justified and should be removed from the WPSVLP in accordance with paragraph 35 of the Framework;
  - ii. Richborough Estates generally support DEV 2 (15 and 16) which relate to accessibility standards and fully support DEV (17) which requires the standards to be subject to technical and viability assessments.
  - iii. Richborough Estates are committed to delivering a wide range of house types the mix of which will be informed by market requirements and discussed with Officers at the planning application stage. Richborough welcome the amendments to Draft Policy DEV 2 (18) which relates to housing for older people and support the removal of the 20% requirement on all residential developments of 10 dwellings or more.

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<sup>2</sup> WPSVLP Policy DEV 2' "in residential development of 10 dwellings or more, or with a gross floor area of greater than 1,000 sqm, affordable housing will be required..."

## Green Belt Release

- 3.27 Warrington's Green Belt was designated in 1979 and largely remains the same today save for minor changes introduced by the UDP. The Green Belt shrink wraps the urban area because it was based upon out-of-date maximum housing requirements which were required at the time the Green Belt designation was made. In accordance with national planning policy, housing requirements are now minimum requirements and as Warrington's Green Belt boundary has seen only minor amendments since it was first established in 1979 there is a clear need to review the Green Belt boundaries in the emerging Local Plan to ensure that Warrington's maximum housing requirements can be delivered in full.
- 3.28 Paragraph 140 of the Framework relates to Green Belt 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.
- 3.29 Paragraph 141 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 reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph (142), and whether the strategy:
- a) makes as much use as possible of suitable brownfield sites and underutilised land;
    - i. WBC has undertaken extensive masterplanning work to try to unlock significant additional urban capacity over and above that identified in the Council's Brownfield Register and SHLAA. An Urban Capacity Study was prepared by WBC in 2016, updated in 2017 and 2019. In identifying land to meet Warrington's need for housing and employment, the Council has sought to maximise the capacity of the existing area to accommodate new development, in order to demonstrate that all reasonable options have been identified for meeting development requirements before releasing Green Belt.
    - ii. The urban capacity figure is a product of the updated SHLAA (2020) figure and the updated masterplanning work undertaken in partnership with Warrington & Co. Table 1 of the WPSVLP sets out an urban capacity of 11,785 dwellings over the plan period. Richborough Estates have concerns with this figure and its deliverability because the densities assumed are very high and brownfield land can have technical and viability challenges which can slow down the delivery of housing.

- 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;
- iii. 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, sites adjacent to a district centre or in other locations that are well served by frequent bus or train services, and on other sites within an existing urban area. The proposed housing allocations are also subject to density requirements. Richborough Estates suggest that the density requirements have been overstated and this is because the urban capacity has been overstated and whilst brownfield land development is strongly supported, it is clear that additional Green Belt sites are required to meet the Council's housing need in full.
- 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.
- i. WBC has confirmed that no neighbouring authorities are able to meet any of Warrington's housing development needs, which is evidenced in the Council's Duty to Cooperate Statement, September 2021. It is also apparent that all of Warrington's neighbouring authorities are having to release Green Belt themselves to meet their own development needs. Furthermore, the Greater Manchester Spatial Framework ("GMSF") not being taken forward a new plan now being prepared is generating additional pressure on Warrington.

3.30 WBC has therefore demonstrated that in order to meet its development needs exceptional circumstances exist for Green Belt release. Richborough Estates strongly agree with WBC that exceptional circumstances exist to justify the release of Green belt land for development, in line with paragraph 140 of the Framework.

### **Location of Green Belt Release**

3.31 **Draft Policy GB1** sets out the Council's strategy for the retention and release of Green Belt land for development. The draft policy sets out (i) general principles, (ii) land removed from the Green Belt, (iii) inset settlements, (iv) Green Belt settlements; and (v) policy for development proposals in the Green Belt.

- 3.32 The draft policy at point 3(f) identifies Richborough Estates' site at Hollins Green to be removed from the Green Belt and Figure 6 shows the amended Green Belt boundaries. Once removed from the Green Belt, Hollins Green will become an inset settlement.
- 3.33 Richborough Estates strongly support the proposed removal of the site from the Green Belt at draft Policy GB1 and Figure 6 and emphasise that Hollins Green is an appropriate location for housing development. The removal of the site from the Green Belt will facilitate the development of an appropriate and sustainably located site which is capable of delivering a minimum of 100 dwellings to meet the requirements of draft Policy DEV1.
- 3.34 The release of the Hollins Green site from the Green Belt fully aligns with Objective 2 of the WPSVLP, which is to ensure Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.

### **Green Belt Assessment**

- 3.35 WBC commissioned Arup to prepare a Green Belt Assessment ("GBA") for the Borough in 2016. Warrington Council prepared a revised Green Belt Assessment in May 2018, which included additional site assessments.
- 3.36 The Council has prepared a further report as part of the WPSVLP 2021 evidence base, 'Green Belt Site Selection – Implications of Green Belt Release' (August 2021). The report summarises the implications for the Green Belt resulting from the proposed allocations in the updated WPSVLP 2021. The report takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundary.
- 3.37 The report makes clear that the Green Belt assessment evidence remains unchanged and therefore the report should be read in conjunction with the original GBA (October 2016), GBA Addendum (July 2017), GBA Additional Site Assessment Report (July 2017) and the subsequent Green Belt site assessments for the remaining Call for Sites and SHLAA sites (July 2017, May 2018, and November 2018). The report states that the Council will be combining all of the previous assessment work into a Green Belt Site Assessments Collated Report, to be published as part of the consultation on the updated Proposed Submission Version Local Plan. At the time of writing, it is unclear whether the 'Green Belt Site Selection – Implications of Green Belt Release' (August 2021) is the collated report and therefore Richborough reserves its position to provide representations on this report at the EiP stage should a further report be published.

3.38 These documents form part of the evidence base for the preparation of the Local Plan. The GBA divides the Borough up in to parcels and assesses each against the 5 purposes of the Green Belt, as set out at Paragraph 138 of the Framework, namely:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.39 The 2021 Green Belt Report is the most up to date evidence base. The 2021 Report concludes that the Hollins Green site makes an overall 'moderate' contribution towards the five purposes of the Green Belt. The conclusions in respect of the site state that (pg. 23):

*"The site currently makes a moderate contribution to Green Belt purposes. Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt alongside the adjacent site (Site Ref: R18/056 / Site Ref: R18/P2/146C) will not harm the overall function and integrity of the Green Belt around Hollins Green. A new recognisable and permanent Green Belt boundary would be created consisting of the A57 Manchester Road and through strengthening the other existing boundaries."*

3.40 Richborough Estates has undertaken its own assessment of the site against the 5 purposes of the Green Belt which is provided at Section 4, page 19 of the Development Statement attached at **Appendix 2**. In contrast to the Council's 2018 GBA and 2021 Green Belt Report, Richborough Estates' assessment demonstrates that the site makes an overall weak contribution.

## Summary

3.41 The WPSVLP at draft Objective OBV1 and draft Policy DEV1 sets out a minimum net requirement of 14,688 new dwellings over an 18-year plan period (2021-2038), in line with the Government's Standard Method which is based on the 2014 household projections. In order to meet this target, WBC will need to release Green Belt land for housing. The WPSVLP has demonstrated that in order to meet its development needs exceptional circumstances for Green Belt release exist. Richborough estates strongly support the Council's case for Green Belt release however raise concerns that the amount of Green Belt release proposed is understated because the Council has overstated the urban capacity.



- 3.42 Richborough Estates support the sustainable growth of Warrington Borough and strongly support the Council's aspirations to release land from the Green Belt in order to meet the minimum requirements of draft Objective OBJ1 and draft Policy DEV1. Richborough Estates strongly agree that exceptional circumstances exist for land to be released from the Green Belt to enable the Council to meet its minimum housing requirements in full. The site as Hollins Green is stated as being able to deliver a minimum of 90 homes. Richborough Estates suggest that the site can deliver a minimum of 100 homes and this is demonstrated in the Development Statement enclosed at Appendix 2 and the following chapter of this document.
- 3.43 Richborough Estates strongly supports the proposed removal of the site from the Green Belt at Draft Policy GB1 and the amendment to the Green Belt boundary shown on Figure 6 and the position of Hollins Green as an inset settlement within the hierarchy. The Council's 2018 GBA and 2021 Green Belt Report concludes that the site makes an overall moderate contribution to the Green Belt. Richborough Estates disagrees with this assessment and it has been demonstrated by Richborough Estates' own assessment that the site makes an overall weak contribution to the Green Belt.

## 4. A DELIVERABLE SITE

- 4.1 Paragraph 68 of the Framework states that planning policies should identify a supply of (a) specific, deliverable sites for years one to five of the plan period<sup>3</sup>. The introductory text for draft Policy OS3 makes clear that the site is intended to be an early delivery site to deliver dwellings within the first 5 years of the Plan period.
- 4.2 This section confirms that the site is available, suitable and achievable to deliver the amount of development proposed by draft policy OS3 of the WPSVLP and additional dwellings as set out in the Development Statement. Examples of development partners who have built out Richborough Estates's sites include Bellway, Barratt David Wilson, CALA, Miller, Mulberry, Kier, Lion Court, Taylor Wimpey and Vistry. On Richborough Estates's sites, the average completion rate is a combined rate of 50 dpa for both market and affordable housing provision therefore the development could be completed within the first five years of the Plan period. As such, the site can be considered deliverable.

### Available

- 4.3 Richborough Estates has entered into an agreement with the landowners to actively promote the site for Green Belt release and residential development.
- 4.4 Richborough Estates has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough Estates are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans. They do not routinely pursue speculative planning applications and take great care in early high-quality public consultation to identify local features and any public concerns. Their continued promotion of the site through the Local Plan process illustrates their commitment to its delivery early within the Plan period.

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<sup>3</sup> Footnote 34 of the Framework. With an appropriate buffer, as set out in paragraph 74. See Glossary for definitions of deliverable and developable.

- 4.5 The site represents a highly sustainable and logical option for Green Belt release owing to its strong physical and defensible boundaries to the west, south-west and south-east, and its location immediately adjacent to the south-west of Hollins Green.
- 4.6 The Illustrative Masterplan contained within the Development Statement demonstrates that the site can accommodate around 100 dwellings, whilst also retaining a considerable proportion of public open space at the south-west of the site and strengthening the new Green Belt boundaries.
- 4.7 The site represents a suitable and excellent development prospect given its ability to deliver housing in a sustainable location, well related to the existing urban area, to help meet current and planned housing needs within the Borough. The development of the site will deliver much needed housing in the short-term, in accordance with draft policy OS3, without having to rely on the delivery of new infrastructure.
- 4.8 Hollins Green is one of the 'outlying settlements' in Warrington Borough which, by virtue of their size, are not washed over by Green Belt. The village benefits from a good level of local facilities and public transport links and is therefore an appropriate and sustainable location to direct a proportion of future housing growth. The sustainability credentials of the site are demonstrated in further detail in the Development Statement at Section 5 (**Appendix 2**).
- 4.9 The Development Statement at Section 5 also sets out that a comprehensive range of technical assessments have been undertaken at the site. The Development Statement demonstrates that there are no significant ecological, flood risk and drainage, landscaping, highways, ground conditions, utilities, archaeology and heritage, air quality and noise constraints that would prevent residential development from coming forward at the site in the short-term.
- 4.10 The site's sustainability credentials are recognised by draft policies DEV1 and GB1 of the WPSVLP, which propose that Hollins Green and the site are in a suitable location to accommodate new residential development. The site is therefore suitable for Green Belt release and an allocation for housing to deliver a minimum of 100 dwellings.

### **Achievable**

- 4.11 The Development Statement demonstrates that there are no technical reasons as to why the site would not be able to accommodate a minimum of 100 dwellings within the first 5

years of the Plan period. This document has been informed by a series of technical assessments which have been prepared to demonstrate that the site is physically suitable to accommodate residential development and that there are no physical constraints that would prevent it from doing so.

- 4.12 Development on the site is therefore considered to be achievable.

### **Scheme Benefits**

- 4.13 The development of the site for housing would deliver a range of economic, social and environmental benefits which are demonstrated at Section 5, page 23 of the Development Statement (**Appendix 2**).

### **Economic Role**

- 4.14 The development of the site for housing would make a positive contribution to building a strong, responsive and competitive economy, in line with national planning policy. The development will create a number of jobs locally during the construction phase, in addition to creating indirect job opportunities within the immediate surrounding area and wider Borough as a result of investment from prospective residents. The delivery of housing at the site will also contribute positively to increasing Council tax income and homes bonus contributions for WBC.

### **Social Role**

- 4.15 The development of the site will help to support a strong, vibrant and healthy community through the provision of much-needed market and affordable housing on a site which is in a suitable and sustainable location. The development of the site will allow for a range of housing types, tenures and sizes to be delivered within the locality, contributing positively to the housing mix in the area. The development of the site will also deliver enhancements in the form of public open space and recreation at the site through the delivery of 1.18ha of open space. There is also potential to deliver 0.05ha of equipped play space on site. The social objective is important in achieving Richborough Estates's aim of leaving a lasting legacy for the communities within which it works.

## **Environmental Role**

- 4.16 The development of the site would create a network of new green space and public open space that can be enjoyed and experienced by both future local residents of the site and by members of the existing local community. In accordance with draft policy OS3, the layout of the development will give consideration to the site's existing landscape features, including water courses, ponds and significant hedgerows and it is considered that the development would result in an overall ecological enhancement.
- 4.17 Richborough Estates has commissioned a highly experienced technical team to assess the physical suitability of the site to accommodate residential development immediately following the adoption of the emerging Local Plan.

## **Summary**

- 4.18 This section has demonstrated that the site is suitable, available and achievable and can deliver residential development (100 dwellings) within the first five years of the Plan period. It has also been demonstrated that there are a series of compelling social, economic and environmental benefits which would be secured through the development of the site for housing. These benefits would be enjoyed by both future residents of the development and existing members of the wider community.

## 5. DRAFT POLICY OS3: HOLLINS GREEN

- 5.1 Draft Policy OS3 of the WPSVLP allocates the site for residential development, underpinned by the Council's updated evidence base, including the Development Options Site Assessment Technical Report (September 2021), the 2018 Green Belt Assessment and the Green Belt Site Selection – Implications of Green Belt Release (August 2021).
- 5.2 Richborough Estates strongly support the principal of removing the site from the Green Belt in line with draft Policy GB1 and allocating it for residential development under draft Policy OS3. The site represents a sustainable and logical location to direct new development on the edge of Hollins Green and is well placed to positively contribute towards meeting Warrington's housing needs over the next plan period. This section provides Richborough Estates' comments on the specific wording of draft Policy OS3.
- 5.3 The introductory text to the policy at Paragraph 10.8.2 of the WPSVLP states that *'development is expected to come forward quickly upon adoption of the Plan. This means the first homes are anticipated to be completed in 2024/25, with the development completed in full within the first 10 years of the Plan period'*.
- 5.4 Richborough Estates are committed to delivering homes on the site as soon as possible and will be able to deliver the site in full within the first five years of the Plan period. Richborough is expected to submit an application in 2023 shortly after adoption and therefore it is likely that the first completion of homes in 2024/25 is achievable.
- 5.5 Richborough Estates are committed to meeting the majority of the key objectives for the site which are set out by draft policy OS3 but raise some objections to the detail of the policy wording (see below):
- ii. **Amount of housing (2)** – Draft policy OS3 requires that a minimum of 90 dwellings are provided on the site. The Illustrative Masterplan provided on page 36 of the Development Statement which has been informed by the technical assessments demonstrates that a housing development of 100 dwellings can be achieved. It is requested that part 1 of draft Policy OS3 is amended as follows:

*“Land to the southwest of Hollins Green (inset settlement) will be removed from the Green Belt and allocated for residential development for a minimum of 90 100 homes”.*

- iii. **New homes (2)** – Richborough Estates has confirmed a commitment to providing a range of housing tenures, types and sizes, including family homes with gardens, homes for first time buyers and some lifetime homes to provide for older persons, as part of a future outline planning application for the site.
- iv. **Affordable Housing Provision (3)** – Richborough Estates will provide 30% affordable housing at the site subject to viability.
- v. **Density (5)** - Draft Policy OS3 requires the site to accommodate a density of 30 dph. Richborough Estates can construct housing to an average minimum density of 35 per net developable hectare. The Illustrative Masterplan at page 36 of the Development Statement shows how this can be achieved across the site along with policy compliant public open space provision. It is requested that part 5 of draft Policy OS3 is amended as follows:  
*“To reflect the site’s location adjacent to the open countryside the development will be constructed to an average minimum density of ~~30dph~~ 35dph”.*
- vi. **Community Facilities (6 and 7)** – Richborough Estates supports the contribution towards the provision of additional primary and secondary school places, and additional primary care capacity, providing it can be demonstrated that there is no existing capacity in the local schools and medical centre.
- vii. **Open Space and Recreation (8 and 9)** – The Illustrative Masterplan contained at page 36 of the Development Statement shows that the site could provide sufficient areas of public open space. This will be made up of a mixture of parks and gardens, natural and semi natural green space and a local equipped area for play (“LEAP”).
- viii. **Green Belt Compensation (13)** – Richborough Estates suggest that financial contributions could be directed towards the Rixton Clay Pits SAC, located north of Lymm, given that the site is identified in Appendix 1 of the Council’s Infrastructure Delivery Plan (2021) as having a circa £190k funding gap.
- ix. **Transport and Accessibility (14)** - Appropriate access into the site can be achieved from the A57 Manchester Road to the south-east.
- x. **Sustainable Transport Links (15)** - Richborough Estates propose the provision of cycling and walking routes within the site on the Illustrative Masterplan, with such networks linking to the wider footways surrounding the site. The development would also make a contribution towards the delivery of sustainable transport modes.

- xi. **Utilities and Environmental Protection (16 – 19)** - The development of the site would incorporate a site-wide surface water strategy, incorporating appropriate Sustainable Urban Drainage Systems (“SUDS”) and flood alleviation measures. Detail of this would be provided as part of any future planning application.
- 5.6 Richborough Estates also object to the inclusion of point 19, which would require any development on the site to meet a proportion of its energy needs from renewable or low carbon sources.
- 5.7 The WPSVLP does not consider location, orientation and design as a way of reducing greenhouse gas emissions through planning for new development and is therefore inconsistent with paragraph 150 of the Framework. Paragraph 155 of the Framework states that, “*To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development...*”. The WPSVLP does not explain clearly what constitutes ‘suitable development’ for renewable and low carbon energy. Furthermore, the WPSVLP does not have a clause whereby new development should comply with development plan policies for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable, as detailed at paragraph 157 of the Framework.
- 5.8 OS3(19) and ENV7 refers to a requirement for all strategic housing and employment allocations to maximise opportunities for the use of decentralised energy systems by making provision to enable future connectivity in terms of site layout, heating design and site wide infrastructure design, ensuring that at least 10% of their energy needs can be met from renewable or other low carbon energy and to reduce carbon emissions by 10% over Part L. Richborough Estates objects to this part of ENV7 because it is unlikely that any site below circa 800 dwellings would be able to consider a combined heat and power (“CHP”) system and therefore such requirements should only be applied to the larger strategic sites. It is therefore requested that point 17 of draft policy OS3 is amended to ensure that it is consistent with national planning policy.

## Summary

- 5.9 Richborough Estates are generally supportive of draft policy OS3 of the WPSVLP, which proposes the site for a housing allocation. However, Richborough raise concerns with



some of the details of the policy wording including the amount and density of the housing and request the opportunity to discuss this further at the EiP.

- 5.10 Section 5 of these representations confirms that Richborough Estates are fully committed to achieving the Council's key development objectives for Hollins Green to make the site an attractive and safe place for future residents and the local community. The Development Statement demonstrates Richborough Estates's further commitment to this, by providing an Illustrative Masterplan, which shows how the site could be developed in order to meet the objectives of Draft Policy OS3.

## 6. OTHER POLICIES

- 6.1 This section of the report considers other draft policies of the WPSVLP and offer comments that Richborough Estates requests are considered and, where appropriate, incorporated into the next stage of the Local Plan process.

WSVLP Policy	Richborough Estates' comment
<p>Policy INF1 – Sustainable Travel and Transport                      Policy DC 1- Warrington Places                      Policy DC 3 – Green Infrastructure Network</p>	<p>Richborough Estates does not object to the principles of these draft Policies. However, Richborough Estates would not support any policy requirements which threatened the viability and/or deliverability development. And request that these policies have subject to viability clauses inserting.</p>
<p>Policy INF5 - Delivering Infrastructure</p>	<p>Richborough Estates generally supports the policy which requires development to provide or contribute towards the provision of the infrastructure needed to support it and agrees that the Council should consider viability at the planning application stage where appropriate.</p>
<p>Policy DC 5 - Open Space, Outdoor Sport and Recreation</p>	<p>In relation to draft Policy DC5 Richborough Estates generally supports the approach of the policy. However, WBC's Playing Pitch Assessment (PPS) and assessment of indoor/non-pitch sports facilities are currently being finalised and a developer contributions methodology is yet to be finalised to establish appropriate levels of contributions. This affects points 5 and 6 of Policy DC 5, which sets out the context for Playing Pitches and Indoor and Recreation Facilities respectively. Therefore, Richborough Estates reserves the right to comment on any meth</p>

	<p>odology established in relation to financial contributions for playing pitches and indoor facilities</p> <p>Richborough Estates would not support a policy requirement for playing pitches and indoor sport and green infrastructure if this threatened the viability and/or deliverability of the site.</p>
<p>Policy DC6 – Quality of Place</p>	<p>Richborough Estates has a history of delivering high quality development and therefore, generally, has no objection to the criteria set out in draft Policy DC6. However, Richborough Estates would like to make the following comments on Point 7 of the Policy, which sets out the following:</p> <p><i>“Developers will be expected to adhere to any additional guidance produced by the Council relating to public realm in their development proposals”</i></p> <p>The explanatory text explains that the Council intends to produce and publish a framework for treatment of the public realm to ensure consistency throughout the Borough.</p> <p>Richborough Estates reserves the right to comment on this document when this is published. Richborough Estates would not support a policy requirement that threatened the viability or deliverability of development.</p>
<p>Policy ENV7 – Renewable and Low Carbon Energy Development</p>	<p>Richborough Estates objects to Policy ENV7 as it is not consistent with national planning policy and in particular paragraphs 153 and 157 of the Framework</p>

	<p>which promote layout, building orientation, massing and landscaping to minimise energy consumption.</p> <p>Paragraph 155 of the Framework states that,</p> <p><i>“To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development...”</i></p> <p>There is no clear explanation within the policy or evidence base, for the WPSVLP of what constitutes ‘suitable development’ for renewable and low carbon energy. Furthermore, there is no clause whereby new development should comply with development plan policies for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable, as detailed at paragraph 157 of the Framework.</p> <p>Policy ENV7(5) refers to a requirement for all strategic housing and employment allocations to maximise opportunities for the use of decentralised energy systems by making provision to enable future connectivity in terms of site layout, heating design and site wide infrastructure design, ensuring that at least 10% of their energy needs can be met from renewable or other low carbon energy and to reduce carbon emissions by 10% over Part L. Richborough Estates objects to this part of ENV7 because it is unlikely that any site below circa 800 dwellings would be able to consider a combined heat and power (“CHP”) system and therefore such</p>
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	requirements should only be applied to the larger strategic sites only.
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## 7. SUMMARY AND CONCLUSIONS

- 7.1 These representations have been prepared by Asteer Planning on behalf of Richborough Estates and refer to land controlled by Richborough Estates at Land North of Manchester Road / A57, Hollins Green as shown edged red on the Site Location Plan at **Appendix 1**. The site is proposed for Green Belt release under Draft Policy GB1 and a housing allocation under Draft Policy OS3<sup>4</sup> of the updated WPSBLP.

### The Site

- 7.2 The Hollins Green site north of Manchester Road/ A57 comprises approximately 4.27 hectares of agricultural land immediately adjoining the south west edge of the settlement of Hollins Green. The site currently lies within designated Green Belt land.

### Meeting Housing Need and Green Belt Release

- 7.3 Warrington's Local Plan must ensure that sufficient homes are delivered to support the growth of Warrington over the plan period and that the type of homes delivered meet the needs of all the Borough's existing and future communities.
- 7.4 **Draft Objective W1** and **Draft Policy DEV1** of the WPSVLP sets out a clear and immediate need for housing in Warrington and identify a net minimum requirement for **14,688** new dwellings over an 18-year delivery period (2021 – 2038), equivalent to 816 dpa.
- 7.5 The WPSVLP at draft Objective OBV1 and draft Policy DEV1 sets out a minimum net requirement of 14,688 new dwellings over an 18-year period (2021-2038), in line with the Government's Standard Method which is based on the 2014 household projections. In order to meet this target, WBC will need to release Green Belt land for housing. The WPSVLP has demonstrated that in order to meet its development needs exceptional circumstances for Green Belt release exist. Richborough estates strongly support the Council's case for Green Belt release however raise concerns that the amount of Green Belt release proposed is understated because the Council has overstated the urban capacity.

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<sup>4</sup> Please note that the site was previously referenced as OS4 in the 2019 WPSVLP.

- 7.6 Richborough Estates support the sustainable growth of Warrington Borough and strongly support the Council's aspirations to release land from the Green Belt in order to meet the minimum requirements of draft Objective OBJ1 and draft Policy DEV1. Richborough Estates strongly agree that exceptional circumstances exist for land to be released from the Green Belt to enable the Council to meet its minimum housing requirements in full. The site as Hollins Green is stated as being able to deliver a minimum of 90 homes. Richborough Estates suggest that the site can deliver a minimum of 100 homes and this is further demonstrate in the Development Statement enclosed at Appendix 2 and the following chapter of this document.
- 7.7 Richborough Estates strongly supports the proposed removal of the site from the Green Belt at Draft Policy GB1 and the amendment to the Green Belt boundary shown on Figure 6 and the position of Hollins Green as an inset settlement within the hierarchy. The Council's 2018 GBA and 2021 Green Belt Report concludes that the site makes an overall moderate contribution to the Green Belt. Richborough Estates disagrees with this assessment and it has been demonstrated by Richborough Estates' own assessment that the site makes an overall weak contribution to the Green Belt.

### **A Deliverable Site**

- 7.8 The site is suitable, available and achievable and can deliver residential development within the first five years of the Plan period. It has been demonstrated that there are a series of compelling social, economic and environmental benefits which would be secured through the development of the site for housing. These benefits would be enjoyed by both future residents of the development and existing members of the wider community.

### **Draft Policy OS3: Hollins Green**

- 7.9 Richborough Estates are generally supportive of draft policy OS3 of the WPSVLP, which proposes the site for a housing allocation. However, Richborough object to some of the details of the policy wording including the amount and density of the housing and renewable energy requirements and request the opportunity to discuss this further at the EiP.

- 7.10 Richborough Estates suggest that in order to ensure the Plan is sound in accordance with paragraph 35 of the Framework the plan must be fully justified and consistent with national policy and therefore some aspects of draft Policy OS3 need to be reviewed by the Council in line with Richborough Estates comments.
- 7.11 Notwithstanding the above, Section 5 of these representations confirms that Richborough Estates are fully committed to achieving the Council's key development objectives for Hollins Green to make the site an attractive and safe place for future residents and the local community. The Development Statement demonstrates Richborough Estates's further commitment to this, by providing an Illustrative Masterplan, which shows how the site could be developed in order to meet the objectives of Draft Policy OS3.

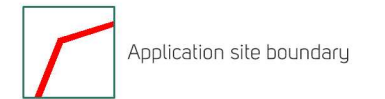
## Summary

- 7.12 In summary, these representations and the Development Statement enclosed at Appendix 2 have demonstrated that:
- i. The site represents a logical and wholly appropriate extension to the existing urban area of Hollins Green;
  - ii. The site is self-contained and has strong physical boundaries, with Manchester Road/A57 to the south-east and existing housing to the north-east and north-west. The western, south-western and south-eastern boundaries of the site will be reinforced through a well- designed landscape scheme;
  - iii. The site makes a weak contribution to the Green Belt when assessed against the five purposes that Green Belt serves as set out at paragraph 138 of the Framework;
  - iv. The site is situated in a sustainable location within close proximity to existing services and facilities in Hollins Green and employment opportunities at Birchwood;
  - v. The site can accommodate a minimum of 100 dwellings at a density of 35 dph;
  - vi. The site can accommodate a high-quality residential development that integrates successfully with the existing built and natural environment, together with sufficient areas of public open space.
  - vii. The development of the site will allow for the provision of good quality cycling and walking routes within the site to connect the site to the wider footway network and existing public right of way to the north, promoting connectivity with the existing community;



- viii. The site is suitable, achievable and available for residential development in accordance with the Framework;
- ix. The site will deliver a range of housing tenures, types and sizes, including a mix of market and affordable housing to meet local needs; and
- x. There are no identified technical or environmental constraints that would prevent the delivery of housing on the site.

## **APPENDIX 1 – SITE LOCATION PLAN**



Project  
Manchesrer Road, Rixton

Drawing Title  
Site Location Plan (Aerial)

Project Code	Drawing Nr	Rev	Drawing Scale
n1204_001	001-01	-	1:1,250 @ A3

## **APPENDIX 2 – RICHBOROUGH ESTATES' PREVIOUS REPRESENTATIONS (JUNE 2019)**

# Representations to the Warrington Proposed Submission Version Local Plan

## Land North of Manchester Road/A57, Hollins Green

On behalf of Richborough Estates Ltd.

June 2019

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# 1. Introduction

- 1.1 These representations have been prepared by Avison Young ("AY") on behalf of Richborough Estates Ltd ("Richborough Estates") and refer to land controlled by Richborough Estates at Land North of Manchester Road / A57, Hollins Green as shown edged red on the Location Plan at **Appendix I**. The site is proposed for Green Belt release under Draft Policy GB1 and a housing allocation under Draft Policy OS4 of the Warrington Proposed Submission Version Local Plan ("WPSVLP").
- 1.2 AY have also prepared a detailed Development Statement to accompany these representations and this is enclosed at **Appendix II**. The Development Statement sets out the case for the removal of the site from the Green Belt and confirms Richborough Estates's commitment to bringing the site forward for residential development in line with the objectives of Draft Policy OS4. It includes summaries from technical assessments which have been prepared to demonstrate that the site is suitable to accommodate the minimum number of dwellings required by the policy. The Development Statement also confirms the site is suitable, available and achievable to accommodate residential development in the immediate term (1-5 years).
- 1.3 These representations provide comments on the strategic policies contained within the WPSVLP. They build upon previous representations made on behalf of Richborough Estates by Nexus Planning and the comprehensive Development Statement attached at **Appendix II**. These documents demonstrate that:
- i. The site represents a logical and wholly appropriate extension to the existing urban area of Hollins Green;
  - ii. The site is self-contained and has strong physical boundaries, with Manchester Road/A57 to the south-east and existing housing to the north-east and north-west. The western, south-western and south-eastern boundaries of the site will be reinforced through a well-designed landscape scheme;
  - iii. The site makes a weak contribution to the Green Belt when assessed against the five purposes that Green Belt serves as set out at paragraph 134 of the National Planning Policy Framework ("NPPF");
  - iv. The site is located in a sustainable location within close proximity to existing services and facilities in Hollins Green and employment opportunities at Birchwood;
  - v. The site can accommodate a high-quality residential development that integrates successfully with the existing built and natural environment, and includes 1.18ha of public open space;

- vi. The development of the site will allow for the provision of good quality cycling and walking routes within the site to connect the site to the wider footway network and existing public right of way to the north, promoting connectivity with the existing community;
  - vii. The site is suitable, achievable and available for residential development in accordance with the NPPF;
  - viii. The site will deliver a range of housing tenures, types and sizes, including a mix of market and affordable housing to meet local needs; and
  - ix. There are no identified technical or environmental constraints that would prevent the delivery of housing on the site.
- 1.4 These representations also demonstrate that there are very special circumstances which exist to justify the release of the site from the Green Belt.

## Background

- 1.5 Following the High Court ruling in February 2015 which quashed the housing target in the adopted Warrington Local Plan Core Strategy (2014), Warrington Borough Council ("WBC") sought to update its housing policies. It became clear that the Borough's needs going forward could not be met without a full review of the adopted Plan.
- 1.6 In October 2016, the Council's Executive Board agreed to commence the process of reviewing the existing Warrington Local Plan. Consultation on the Preferred Development Option ("PDO") was undertaken between July and September 2017. Approximately 4,500 responses were received to the PDO consultation, a significant proportion of which related to the scale and location of development proposed and Green Belt release.
- 1.7 Since the PDO consultation, WBC has prepared a number of evidence base studies to demonstrate that: (i) the emerging Local Plan is based on the most up to date assessment of Warrington's development needs; (ii) all options for meeting these needs have been appropriately considered; and (iii) the infrastructure requirements to support new development are understood and are deliverable.
- 1.8 The WPSVLP has been published for a nine-week consultation period between Monday 15 April and Monday 17 June 2019. The Council will then review all of the representations made during the consultation prior to submitting the Plan for 'Examination in Public' ("EiP") to be carried out by an independent inspector. It is anticipated that the earliest date for the examination will be early 2020.



- 1.9 Richborough Estates are promoting land at Hollins Green, Rixton through the emerging Local Plan process for Green Belt release and allocation for housing.

## 2. The Site

- 2.1 The Hollins Green site north of Manchester Road/ A57 comprises approximately 4.27 hectares of agricultural land immediately adjoining the south west edge of the settlement of Hollins Green. The site currently lies within designated Green Belt land.
- 2.2 The north-eastern boundary runs adjacent to the houses and gardens of Glen Close, Warburton View and Orchard Brow in Hollins Green. The north-western boundary runs adjacent to the cul-de-sac of Marsh Brook Close, areas of green amenity space and a small area of woodland. The south-western boundary of the site is formed by Marsh Brook and a buffer of trees, beyond which is the access road and buildings of Brook Farm. The south-eastern boundary is formed by the A57.
- 2.3 There is limited vegetation on the site, with the exception of trees along the south-western boundary along Marsh Brook, and a hedgerow between the site and the A57. There are no buildings located within the site. There is a public right of way (Rixton with Glazebrook 11) running parallel to the northern boundary of the site from Manchester Road/A57 to Marsh Brook Close.
- 2.4 Richborough Estates control the majority of the land within the proposed housing allocation under draft policy OS4. The land controlled by Richborough Estates is shown red on the Location Plan at **Appendix I**. The remainder of the land within the allocation, which is located to the north west of Marsh Brook Close is controlled by a third party and is shown edged blue on the Ownership Plan at **Appendix III**. This land has planning permission for 4 detached dwellings under planning permission reference 2018/32900, which was granted on appeal in February 2019<sup>1</sup>. It is understood that these dwellings will be self-build houses, which is a requirement of draft policy OS4.

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<sup>1</sup> Appeal ref: APP/M0655/W/18/3212405

### 3. Meeting Housing Needs and Green Belt Release

#### Meeting Housing Needs

- 3.1 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. As WBC has not yet submitted its Local Plan for examination, the revised framework applies.
- 3.2 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.
- 3.3 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.
- 3.4 **Draft Objective W1** and **Draft Policy DEV1** of the WPSVLP set out a clear, immediate and critical need for housing in Warrington and identify 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.
- 3.5 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.

- 3.6 The WPSVLP acknowledges the need to release Green Belt land. However, lead in times for the major infrastructure required to deliver the Waterfront, Garden Suburb and South West Extension require a lower level of housing to be delivered in the first 5 years of the Plan period (2017-2021).
- 3.7 A large proportion of all homes to be delivered within the Plan period are proposed within the large sustainable extension sites such as the Warrington Garden Suburb (5,100 homes), Waterfront (2,000 homes) and South West Extension (1,600 homes). Although some short term delivery can be expected, these larger sites will take several years to begin delivering significant numbers due to the infrastructure required to facilitate such development. In addition, Draft Policy MD2 – Warrington Garden Suburb will require developers to: (i) jointly prepare a Development Framework for the Garden Suburb as a whole and (ii) individual Masterplans for each of the three villages and Neighbourhood Centre. Our experience of such exercises is that there is a 1-2 year time lag for the preparation of such complex documents.
- 3.8 The Plan does however also make a small number of more modest allocations, which are immediately deliverable and do not require any significant infrastructure investment to facilitate their delivery. These allocated sites are listed under Draft Policy DEV1 at point 4 which identifies that a minimum of 1,085 homes will be delivered on allocated sites to be removed from the Green Belt adjacent to the following outlying settlements:
- (i) Burtonwood – minimum of 160 homes;
  - (ii) Croft – minimum of 75 homes;
  - (iii) Culcheth – minimum of 200 homes;
  - (iv) Hollins Green – minimum of 90 homes;
  - (v) Lymm – minimum of 430 homes;
  - (vi) Winwick – minimum of 130 homes.
- 3.9 Richborough Estates strongly supports the proposed Green Belt release at Hollins Green for a minimum of 90 homes in draft policy DEV1 at point 4d. It is necessary for the Council to ensure that a range of sites are allocated. These should include a realistic number of small and medium sized sites which are well connected to existing services and amenities and are therefore deliverable in the short term. This approach is in line with Paragraph 68 of the NPPF, which recognises that *“small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”*<sup>2</sup>. Local Authorities should therefore ensure their Local Plans allocate a sufficient number of small and medium sites to safeguard the Borough’s five-year housing land supply.

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<sup>2</sup> NPPF, February 2019, Paragraph 68

3.10 Draft Policy DEV 2 of the WPSVLP sets out the Borough's housing requirements in order to meet the identified need over the plan period. Draft policy Dev 2 requires residential developments to provide 30% affordable housing outside of inner Warrington, 10% of which should be for affordable home ownership. The balance of affordable housing should then be provided for either affordable rent or social rent. Draft policy DEV 2 seeks to provide a mix of house sizes and types and also states that 20% of provision must be made to accommodate the needs of older people. The draft policy also makes provision for self-build and custom build housing.

3.11 Richborough Estates do not object to the principle of draft policy DEV 2, but would like to make the following comments:

- i. Firstly, the affordable housing requirement is in line with the need set out in the Local Housing Need Assessment 2019 ("LHNA") and Richborough Estates have no objection to the calculation for the projected need over the plan period;
- ii. Secondly, Richborough Estates are committed to delivering a wide range of house types the mix of which will be informed by market requirements and discussed with Officers at the planning application stage ; and
- iii. Thirdly, in relation to the requirement that 20% of provision must be made to accommodate the needs of older people, the explanatory text in the WPSVLP under Paragraph 4.1.54 states:

*"The LHNA identifies the need for around 20% of new homes in Warrington to be provided to accommodate older persons and for an additional 1,579 bed spaces within extra care facilities" (LHNA Table 48)*

3.12 The above requirement is not consistent with what the Warrington Local Housing Needs Assessment 2019 states. Reference to bed spaces for older persons is not made in Table 48, but instead Tables 41 and 56 respectively. In addition, the need is identified as being 1,597 as opposed to 1,579 over the plan period. The LHNA makes the following statement on provision for older people:

*"The economic led population growth would result in a net need for 1,597 C2 bedspaces for older persons in the HMA over the 2017-37 period (80 per annum). The assessment, however, should be treated as indicative and does not seek to set policies for how older persons with care needs should be accommodated.*

*GL Hearn recommends that councils should give consideration to how best to deliver the identified specialist housing need, including, for instance, the potential to identify sites in accessible locations for specialist housing or to require the provision of specialist housing for older people as part of larger strategic development schemes".*

3.13 The LHNA recommends that Councils should give consideration to how best to deliver housing for older persons but does not recommend specifically that around 20% of new homes should accommodate the needs of older persons. Whilst Richborough Estates acknowledge the increase in demand and generally support the provision for older persons' needs, the rate of provision specified (20%) for every development over 10 dwellings is not sound and is not based on the Council's evidence base. This requirement should be considered on a site by site basis, with consideration given to the need of the individual area in question, as this may differ by location. Therefore, the wording of draft policy DEV 2 (point 11) should be amended as follows:

11. *"In residential development over 10 dwellings or more ~~20% provision~~ **consideration** must be made to accommodate the needs of older people. The ~~nature~~ **rate and nature of the provision** will be determined on a site by site basis depending on demand in a particular area and the appropriate type of provision for the site and/or scheme".*

## Green Belt Release

- 3.14 The history of the Warrington Green Belt is set out in detail in the Arup Green Belt Assessment ("GBA"), dated 21st October 2016. The Green Belt around Warrington was first formally introduced in the Cheshire Structure Plan (adopted in 1979) with the extent broadly defined on the Key Diagram. Later alterations of the Structure Plan did not change the extent of the Green Belt.
- 3.15 The Unitary Development Plan ("UDP") (2006) was the first single comprehensive statutory development plan for the Borough and was the first Local Plan to formally define the Green Belt. The UDP made minor changes to the Green Belt introduced in 1979 in the Cheshire Structure Plan.
- 3.16 The Local Plan Core Strategy was based on a 'regeneration first' approach which was required to be consistent with the now revoked North West Regional Spatial Strategy ("RSS"), which identified no strategic change to Green Belt boundaries in Warrington before 2021.
- 3.17 In summary, Warrington's Green Belt was designated in 1979 and largely remains the same today save for minor changes introduced by the UDP. The Green Belt shrink wraps the urban area because it was based upon out of date maximum housing requirements which were required at the time the Green Belt designation was made. In accordance with national planning policy, housing requirements are now minimum requirements and as Warrington's Green Belt boundary has seen only minor amendments since it was first established in 1979 there is a clear need to review the Green Belt boundaries in the emerging Local Plan to ensure that Warrington's maximum housing requirements can be delivered in full.
- 3.18 Chapter 13 of the NPPF on Green Belt 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).

3.19 Paragraph 137 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 reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, 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;*

- I. WBC has undertaken extensive masterplanning work to try to unlock significant additional urban capacity over and above that identified in the Council's Brownfield Register and SHLAA. An Urban Capacity Study was prepared by WBC in 2016, updated in 2017 and 2019. In identifying land to meet Warrington's need for housing and employment, the Council has sought to maximise the capacity of the existing area to accommodate new development, in order to demonstrate that all reasonable options have been identified for meeting development requirements before releasing Green Belt.
- II. The urban capacity figure is a product of the updated SHLAA (2018) figure and the updated masterplanning work undertaken in partnership with Warrington & Co. The assessment identifies an urban capacity for 13,726 dwellings.

*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;*

- I. 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. It is clear from the Council's evidence base that through the review of the density requirements that Green Belt release is required to meet the Council's OAN in full.
- II. In relation to specific density requirements, as set out in the Urban Capacity Assessment 2019, Richborough Estates reserves the right to comment on these further following a comprehensive and detailed review of the requirements.

*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*

- I. WBC has confirmed that no neighbouring authorities are able to meet any of Warrington's housing development needs, which is evidenced in the Council's Duty to Cooperate Statement, March 2019. It is also apparent that all of Warrington's neighbouring

authorities are having to release Green Belt themselves to meet their own development needs. Furthermore, the Greater Manchester Spatial Framework ("GMSF") is stalling generating additional pressure on Warrington.

- 3.20 WBC has therefore demonstrated that in order to meet its development needs exceptional circumstances exist for Green Belt release. Richborough Estates strongly agree with WBC that exceptional circumstances exist to justify the release of Green belt land for development, in line with paragraph 136 of the NPPF.

## Location of Green Belt Release

- 3.21 Draft Policy GB1 sets out the Council's strategy for the retention and release of Green Belt land for development. The draft policy sets out (i) general principles, (ii) land removed from the Green Belt, (iii) inset settlements, (iv) Green Belt settlements; and (v) policy for development proposals in the Green Belt.
- 3.22 The draft policy at point 3g identifies Richborough Estates's site at Hollins Green to be removed from the Green Belt and figure 6 shows the amended Green Belt boundaries. Richborough Estates strongly supports the proposed removal of the site from the Green Belt at draft policy GB1 and figure 6. The removal of the site from the Green Belt will facilitate the development of an appropriate and sustainably located site which is capable of delivering a minimum of 90 dwellings to meet the requirements of draft policy DEV1.
- 3.23 The release of the Hollins Green site from the Green Belt fully aligns with Objective 2 of the WPSVLP, which is to ensure Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.

## Green Belt Assessment

- 3.24 Warrington Council commissioned Arup to prepare a Green Belt Assessment ("GBA") for the Borough in 2016. Warrington Council prepared a revised Green Belt Assessment in May 2018, which included additional site assessments. These documents form a key part of the evidence base for the preparation of the Local Plan. The GBA divides the Borough up in to parcels and assesses each against the 5 purposes of the Green Belt, as set out at Paragraph 134 of the NPPF, namely:
- 1) to check the unrestricted sprawl of large built-up areas;
  - 2) to prevent neighbouring towns merging into one another;
  - 3) to assist in safeguarding the countryside from encroachment;



- 4) to preserve the setting and special character of historic towns; and
  - 5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.25 Since October 2016, two subsequent GBAs have been produced, one in July 2017 and one in May 2018. The 2018 GBA is most relevant to the site owing to it being both the most recent GBA and because it assesses the site in its entirety and in isolation (parcel reference R18/P2/151). The 2018 GBA concludes that the Hollins Green site makes an overall 'moderate' contribution towards the five purposes of the Green Belt. The conclusions in respect of the site state that:

*"In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution. Whilst the site supports a strong degree of openness and the boundary with the settlement is less durable, the site's boundaries with the countryside are mostly durable and could contain development, preventing it from threatening the overall openness and permanence of the Green Belt."*

- 3.26 Richborough Estates has undertaken its own assessment of the site against the 5 purposes of the Green Belt which is provided at Section 4, page 19 of the Development Statement attached at **Appendix II**. In contrast to the Council's 2018 GBA, Richborough Estates's assessment demonstrates that the site makes an overall weak contribution to the Green Belt which further supports the site's release from the Green Belt.

## Summary

- 3.27 The WPSVLP at draft objective OBV1 and draft policy DEV1 sets out a minimum net requirement of 18,900 new dwellings over a 20 year period (2017-2037), 4% higher than the minimum requirement set by the Government's Standard Housing Methodology. In order to meet this target, WBC will need to release Green Belt land for housing. The WPSVLP has demonstrated that in order to meet its development needs exceptional circumstances for Green Belt release exist.
- 3.28 Richborough Estates support the sustainable growth of Warrington Borough and strongly support the Council's aspirations to release land from the Green Belt in order to meet the minimum requirements of draft objective OBJ1 and draft policy DEV1. Richborough Estates strongly agree that exceptional circumstances exist for land to be released from the Green Belt to enable the Council to meet its minimum housing requirements in full.
- 3.29 Richborough Estates strongly supports the proposed removal of the site from the Green Belt at draft policy GB1 and the amendment to the Green Belt boundary shown on figure 6. The Council's 2018 Green Belt Assessment concludes that the site makes an overall moderate contribution to the Green Belt. Richborough Estates disagrees with this assessment and it has been

demonstrated by Richborough Estates's own assessment that the site makes an overall weak contribution to the Green Belt.

## 4. A Deliverable Site

- 4.1 Paragraph 67 of the NPPF states that: '*planning policies should identify a supply of (a) specific, deliverable sites for years one to five of the plan period*<sup>3</sup>'. The introductory text for draft policy OS4 makes clear that the site is intended to be an early delivery site to deliver dwellings within the first 5 years of the Plan period.
- 4.2 This section confirms that the site is available, suitable and achievable to deliver the amount of development proposed by draft policy OS4 of the WPSVLP. Examples of development partners who have built out Richborough Estates's sites include CALA, Miller, Bellway, Mulberry, Barratt David Wilson, Bovis, Kier, Lion Court and Taylor Wimpey. On Richborough Estates's sites, the average completion rate is 35 dwellings per annum; therefore housing would be delivered on the site within five years and consequently the development could be completed within the first 10 years of the Plan period. As such, the site can be considered deliverable.

### Available

- 4.3 Richborough Estates has entered into an agreement with the landowners to actively promote the site for Green Belt release and residential development. Richborough Estates has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough Estates are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans. They do not routinely pursue speculative planning applications and take great care in early high-quality public consultation to identify local features and any public concerns. Their continued promotion of the site through the Local Plan process illustrates their commitment to its delivery early within the Plan period.

### Suitable

- 4.4 The site represents a highly sustainable and logical option for Green Belt release owing to its strong physical and defensible boundaries to the west, south-west and south-east, and its location immediately adjacent to the south-west of Hollins Green. The Illustrative Masterplan contained within the Development Statement at **Appendix II** demonstrates that the site can accommodate around 100 dwellings, whilst also retaining a considerable proportion of public open space at the south-west of the site and strengthening the new Green Belt boundaries.
- 4.5 The site represents a suitable and excellent development prospect given its ability to deliver housing in a sustainable location, well related to the existing urban area, to help meet current

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<sup>3</sup> Ibid, Paragraph 67

and planned housing needs within the Borough. The development of the site will deliver much needed housing in the short-term, in accordance with draft policy OS4, without having to rely on the delivery of new infrastructure.

- 4.6 Hollins Green is one of the 'outlying settlements' in Warrington Borough which, by virtue of their size, are not washed over by Green Belt. The village benefits from a good level of local facilities and public transport links and is therefore an appropriate and sustainable location to direct a proportion of future housing growth. The sustainability credentials of the site are demonstrated in further detail in the Development Statement at Section 5. The Development Statement at Section 5 also sets out that a comprehensive range of technical assessments have been undertaken at the site. The Development Statement demonstrates that there are no significant ecological, flood risk and drainage, landscaping, highways, ground conditions, utilities, archaeology and heritage, air quality and noise constraints that would prevent residential development from coming forward at the site in the short-term.
- 4.7 The site's sustainability credentials are recognised by draft policies DEV1 and GB1 of the WPSVLP, which propose that Hollins Green and the site are in a suitable location to accommodate new residential development. The site is therefore suitable for Green Belt release and an allocation for housing to deliver a minimum of 90 dwellings.

### **Achievable**

- 4.8 The Development Statement demonstrates that there are no technical reasons as to why the site would not be able to accommodate a minimum of 90 dwellings within the first 5 years of the Plan period. This document has been informed by a series of technical assessments which have been prepared to demonstrate that the site is physically suitable to accommodate residential development and that there are no physical constraints that would prevent it from doing so. Development on the site is therefore considered to be achievable.

### **Scheme Benefits**

- 4.9 The development of the site for housing would deliver a range of economic, social and environmental benefits which are demonstrated at Section 5, page 23 of the Development Statement.

### **Economic Role**

- 4.10 The development of the site for housing would make a positive contribution to building a strong, responsive and competitive economy, in line with national planning policy. The development will create a number of jobs locally during the construction phase, in addition to creating indirect job opportunities within the immediate surrounding area and wider Borough as a result of investment from prospective residents. The delivery of housing at the site will also contribute positively to increasing Council tax income and homes bonus contributions for WBC.

### **Social Role**

- 4.11 The development of the site will help to support a strong, vibrant and healthy community through the provision of much-needed market and affordable housing on a site which is in a suitable and sustainable location. The development of the site will allow for a range of housing types, tenures and sizes to be delivered within the locality, contributing positively to the housing mix in the area. The development of the site will also deliver enhancements in the form of public open space and recreation at the site through the delivery of 1.18ha of open space. There is also potential to deliver 0.05ha of equipped play space on site. The social objective is important in achieving Richborough Estates's aim of leaving a lasting legacy for the communities within which it works.

### **Environmental Role**

- 4.12 The development of the site would create a network of new green space and public open space that can be enjoyed and experienced by both future local residents of the site and by members of the existing local community. In accordance with draft policy OS4, the layout of the development will give consideration to the site's existing landscape features, including water courses, ponds and significant hedgerows.
- 4.13 Richborough Estates has commissioned a highly experienced technical team to assess the physical suitability of the site to accommodate residential development immediately following the adoption of the emerging Local Plan.

### **Summary**

- 4.14 This section has demonstrated that the site is suitable, available and achievable and can deliver residential development within the first five years of the Plan period. It has also been demonstrated that there are a series of compelling social, economic and environmental benefits which would be secured through the development of the site for housing. These benefits would be enjoyed by both future residents of the development and existing members of the wider community.

## 5. Draft Policy OS4: Hollins Green

- 5.1 Draft Policy OS4 of the WPSVLP allocates the site for residential development, underpinned by the Council's comprehensive evidence base, including the Development Options Site Assessment Technical Report (March 2019) and the 2018 GBA.
- 5.2 Richborough Estates strongly support the principal of removing the site from the Green Belt in line with draft policy GB1 and allocating it for residential development under draft policy OS4. The site represents a sustainable and logical location to direct new development on the edge of Hollins Green and is well placed to positively contribute towards meeting Warrington's housing needs over the next plan period. This section provides Richborough Estates's comments on the specific wording of draft policy OS4.
- 5.3 The introductory text to the policy at Paragraph 10.8.2 of the WPSVLP states that '*development is expected to come forward quickly upon adoption of the Plan. This means the first homes are anticipated to be completed in 2021/22, with the development completed in full within the first 10 years of the Plan period*'. Although Richborough Estates are committed to delivering homes on the site as soon as possible and will be able to deliver the site in full within the first 10 years of the Plan period, it is unlikely given the current timescales for the adoption of the Local Plan that homes will be delivered as early as 2021 because the Plan is not likely to be adopted until late 2020 and the site removed from the Green Belt. Whilst Richborough would expect to submit an application in 2020 shortly after adoption, there is a need to factor in the timescales for obtaining the outline planning consent, disposing of the site to a house builder and the chosen house builder obtaining a reserved matters consent. In light of this it is requested that these delivery timescales are amended to reflect the first completion of homes in 2022/23.
- 5.4 As demonstrated in the enclosed Development Statement, Richborough Estates are committed to meeting the majority of the key objectives for the site which are set out by draft policy OS4. This includes the following site-specific features:
- i. **Amount of Housing** - Draft policy OS4 requires that a minimum of 90 dwellings are provided on the site. The Illustrative Masterplan provided on page 36 of the Development Statement which has been informed by the technical assessments demonstrates that a housing development of 100 dwellings can be achieved. It is requested that part 1 of draft policy OS4 is amended as follows:

*"Land to the southwest of Hollins Green (inset settlement) will be removed from the Green Belt and allocated for residential development for a minimum of ~~90~~ 100 homes".*

- ii. **New Homes:** Richborough Estates has confirmed a commitment to providing a range of housing tenures, types and sizes, including family homes with gardens, homes for first time buyers and some lifetime homes to provide for older persons, as part of a future outline planning application for the site. The requirement to provide self-build units will be met on the adjacent land in the north west corner of the site allocation, which has planning permission for 4 dwellings.
  - iii. **Affordable Housing Provision:** Richborough Estates will provide 30% affordable housing at the site subject to viability.
  - iv. **Density:** Richborough Estates can construct housing to an average minimum density of 30 dwellings per hectare as required by draft policy OS4. The Illustrative Masterplan at page 36 of the Development Statement shows how this can be achieved across the site along with policy compliant public open space provision.
  - v. **Community Facilities:** Richborough Estates supports the contribution towards the provision of additional primary and secondary school places, and additional primary care capacity, providing it can be demonstrated that there is no existing capacity in the local schools and medical centre.
  - vi. **Open Space and Recreation:** The Illustrative Masterplan contained at page 36 of the Development Statement shows that the site could provide at 1.18ha hectares of public open space. This will be made up of a mixture of parks and gardens, natural and semi natural green space and equipped play (LEAP).
  - vii. **Transport and Accessibility:** Appropriate access into the site can be achieved from the A57 Manchester Road to the south-east.
  - viii. **Sustainable Transport Links:** Richborough Estates propose the provision of cycling and walking routes within the site on the Illustrative Masterplan, with such networks linking to the wider footways surrounding the site. The development would also make a contribution towards the delivery of sustainable transport modes.
  - ix. **Utilities and Environmental Protection:** The development of the site would incorporate a site-wide surface water strategy, incorporating appropriate Sustainable Urban Drainage Systems ("SUDS") and flood alleviation measures. Detail of this would be provided as part of any future planning application.
- 5.5 Although Richborough Estates is wholly supportive of the majority of Policy OS4's key objectives, they object to the inclusion of point 17, which would require any development on the site to meet a proportion of its energy needs from renewable or low carbon sources. The WPSVLP does not consider location, orientation and design as a way of reducing greenhouse gas emissions through

planning for new development, and is therefore inconsistent with paragraph 150 of the NPPF. Paragraph 151 of the NPPF states that, *"To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development..."*. The WPSVLP does not explain clearly what constitutes 'suitable development' for renewable and low carbon energy. Furthermore, the WPSVLP does not have a clause whereby new development should comply with development plan policies for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable, as detailed at paragraph 153 of the NPPF.

- 5.6 Policy ENV7 refers to a requirement for major residential development (11 units or more) in all locations outside strategic allocations to meet at least 10% of their energy needs from renewable and/or other low carbon energy source(s). In order to be sound, the 10% requirement must be robustly and clearly evidenced. Whilst the Council points to the 'Liverpool City Region - Renewable Energy Capacity Study (2010)' as part of its 'Key Evidence' for Policy ENV7, Richborough Estates has not been able to locate this document on the Council's website. However, in any case, even if the 10% requirement is evidenced, Richborough Estates questions why this 10% could not be achieved firstly, at least in part, through the orientation and fabric of the development, in line with national planning policy.

## Summary

- 5.7 In summary, Richborough Estates are strongly supportive of draft policy OS4 of the WPSVLP, which proposes the site for a housing allocation. This section has confirmed that Richborough Estates are fully committed to achieving the Council's key development objectives for Hollins Green to make the site an attractive and safe place for future residents and the local community. The Development Statement demonstrates Richborough Estates's further commitment to this, by providing an Illustrative Masterplan, which shows how the site could be developed in order to meet the objectives of draft policy OS4.
- 5.8 Richborough Estates are fully supportive of Objectives 1-16 contained within draft policy OS4. However, they object to the inclusion of criteria 17 because, as currently drafted, the criteria is not consistent with national planning policy and specifically paragraphs 150 and 153 of the NPPF which promote layout, building orientation, massing and landscaping to minimise energy consumption.



## 6. Other Policies

6.1 This section of the report considers other draft policies of the WPSVLP and offers comments that Richborough Estates requests are considered and, where appropriate, incorporated into the next stage of the Local Plan process.

WPSVLP Policy	Richborough Estates' comment
<p>Policy INF1 – Sustainable Travel and Transport</p> <p>Policy DC 1- Warrington Places</p> <p>Policy DC 3 – Green Infrastructure Network</p>	<p>Richborough Estates does not object to the principles of these draft Policies. However, Richborough Estates would not support any policy requirements which threatened the viability and/or deliverability development.</p>
<p>Policy INF5 - Delivering Infrastructure</p>	<p>Richborough Estates generally supports the policy which requires development to provide or contribute towards the provision of the infrastructure needed to support it and agrees that the Council should consider viability at the planning application stage where appropriate.</p>
<p>Policy DC 5 - Open Space, Outdoor Sport and Recreation</p>	<p>In relation to draft Policy DC5 Richborough Estates generally supports the approach of the policy. However, WBC’s Playing Pitch Assessment (PPS) and assessment of indoor/non-pitch sports facilities are currently being finalised and a developer contributions methodology is yet to be finalised to establish appropriate levels of contributions. This affects points 5 and 6 of Policy DC 5, which sets out the context for Playing Pitches and Indoor and Recreation Facilities respectively. Therefore, Richborough Estates reserves the right to comment on any methodology established in relation to financial contributions for playing pitches and indoor facilities</p> <p>Richborough Estates would not support a policy requirement for playing pitches and indoor sport and green infrastructure if this threatened the viability and/or deliverability of the site.</p>
<p>Policy DC6 – Quality of Place</p>	<p>Richborough Estates has a history of delivering</p>

WPSVLP Policy	Richborough Estates' comment
	<p>high quality development and therefore, generally, has no objection to the criteria set out in draft Policy DC6. However, Richborough Estates would like to make the following comments on Point 7 of the Policy, which sets out the following:</p> <p><i>“Developers will be expected to adhere to any additional guidance produced by the Council relating to public realm in their development proposals”</i></p> <p>The explanatory text explains that the Council intends to produce and publish a framework for treatment of the public realm to ensure consistency throughout the Borough.</p> <p>Richborough Estates reserves the right to comment on this document when this is published. Richborough Estates would not support a policy requirement that threatened the viability or deliverability of development</p>
<p>Policy ENV7 – Renewable and Low Carbon Energy Development</p>	<p>Richborough Estates objects to Policy ENV7 as it is not consistent with national planning policy and in particular paragraphs 150 and 153 of the NPPF which promote layout, building orientation, massing and landscaping to minimise energy consumption.</p> <p>Paragraph 151 of the NPPF states that,</p> <p><i>“To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development...”</i>.</p> <p>There is no clear explanation within the policy or evidence base, for the WPSVLP of what constitutes ‘suitable development’ for renewable and low carbon energy. Furthermore, there is no clause whereby new development should comply with development plan policies for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable, as detailed at paragraph 153</p>

WPSVLP Policy	Richborough Estates' comment
	<p>of the NPPF.</p> <p>Policy ENV7 refers to a requirement for major residential development (11 units or more) in all locations outside strategic allocations to meet at least 10% of their energy needs from renewable and/or other low carbon energy source(s). In order to be sound, the 10% requirement must be robustly and clearly evidenced. Whilst the Council points to the 'Liverpool City Region - Renewable Energy Capacity Study (2010)' as part of its 'Key Evidence' for Policy ENV7, Richborough Estates has not been able to locate this document on the Council's website. However, in any case, even if the 10% requirement is evidenced, Richborough Estates questions why this 10% could not be achieved firstly, at least in part, through the orientation and fabric of the development, in line with national planning policy.</p>

## 7. Conclusions

- 7.1 These representations have been prepared by Avison Young on behalf of Richborough Estates and relate to land controlled by Richborough Estates at land north of Manchester Road/A57, Hollins Green. The site is proposed for Green Belt release under draft policy GB1 and proposed for allocation for housing under policy OS4 of the WPSVLP.

### Meeting Housing Needs and Green Belt Release

- 7.2 The WPSVLP at draft objective OBV1 and draft policy DEV1 sets out a minimum net requirement of 18,900 new dwellings over a 20 year period (2017-2037), 4% higher than the minimum requirement set by the Government's Standard Housing Methodology. In order to meet this target, WBC will need to release Green Belt land for housing. The WPSVLP has demonstrated that in order to meet its development needs exceptional circumstances for Green Belt release exist.
- 7.3 Richborough Estates support the sustainable growth of Warrington Borough and strongly support the Council's aspirations to release land from the Green Belt in order to meet the minimum requirements of draft objective OBJ1 and draft policy DEV1. Richborough Estates strongly agree that exceptional circumstances exist for land to be released from the Green Belt to enable the Council to meet its minimum housing requirements in full.
- 7.4 Richborough Estates strongly supports the proposed removal of the site from the Green Belt at draft policy GB1 and the amendment to the Green Belt boundary shown on figure 6. The Council's 2018 Green Belt Assessment concludes that the site makes an overall moderate contribution to the Green Belt. Richborough Estates disagrees with this assessment and it has been demonstrated by Richborough Estates's own assessment that the site makes an overall weak contribution to the Green Belt.

### A Deliverable Site

- 7.5 Section 4 of these representations has demonstrated that the site is suitable, available and achievable and can deliver residential development within the first five years of the Plan period. It has also been demonstrated that there are a series of compelling social, economic and environmental benefits which would be secured through the development of the site for housing. These benefits would be enjoyed by both future residents of the development and existing members of the wider community.

## Draft Policy OS4: Hollins Green

- 7.6 Richborough Estates are strongly supportive of draft policy OS4 of the WPSVLP, which proposes the site for a housing allocation. Section 5 of these representations confirms that Richborough Estates are fully committed to achieving the Council's key development objectives for Hollins Green to make the site an attractive and safe place for future residents and the local community. The Development Statement demonstrates Richborough Estates's further commitment to this, by providing an Illustrative Masterplan, which shows how the site could be developed in order to meet the objectives of Draft Policy OS4.
- 7.7 Richborough Estates are fully supportive of Objectives 1-16 contained within Draft Policy OS4. However, they object to the inclusion of criteria 17 because, as currently drafted, the criteria is not consistent with national planning policy and specifically paragraphs 150 and 153 of the NPPF which promote layout, building orientation, massing and landscaping to minimise energy consumption.

### Summary

- 7.8 In summary, these representations and the enclosed Development Statement have demonstrated that:
- i. The site represents a logical and wholly appropriate extension to the existing urban area of Hollins Green;
  - ii. The site is self-contained and has strong physical boundaries, with Manchester Road/A57 to the south-east and existing housing to the north-east and north-west. The western, south-western and south-eastern boundaries of the site will be reinforced through a well-designed landscape scheme;
  - iii. The site makes a weak contribution to the Green Belt when assessed against the five purposes that Green Belt serves as set out at paragraph 134 of the National Planning Policy Framework ("NPPF");
  - iv. The site is located in a sustainable location within close proximity to existing services and facilities in Hollins Green and employment opportunities at Birchwood;
  - v. The site can accommodate a high-quality residential development that integrates successfully with the existing built and natural environment, and includes 1.18ha of public open space;

- vi. The development of the site will allow for the provision of good quality cycling and walking routes within the site to connect the site to the wider footway network and existing public right of way to the north, promoting connectivity with the existing community;
- vii. The site is suitable, achievable and available for residential development in accordance with the NPPF;
- viii. The site will deliver a range of housing tenures, types and sizes, including a mix of market and affordable housing to meet local needs; and
- ix. There are no identified technical or environmental constraints that would prevent the delivery of housing on the site.

# Appendix I Location Plan



**nineteen47**  
CHARTERED TOWN PLANNERS  
& URBAN DESIGNERS

Project  
Manchester Road, Rixton

Drawing Title  
Site Location Plan (Aerial)

Project Code	Drawing Nr	Rev	Drawing Scale
n1204_001	001-01	-	1:1,250 @ A3



# Appendix II Development Statement

Strategic Land Promotion  
*Helping places evolve*



Richborough  
Estates

# Hollins Green

**Development Statement**

Land North of Manchester Road/A57, Hollins Green

June 2019

[www.richboroughestates.co.uk](http://www.richboroughestates.co.uk)

# Hollins Green

## Development Statement

Land North of Manchester Road/A57, Hollins Green

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# Executive Summary







**This Development Statement has been prepared by Avison Young on behalf of Richborough Estates Ltd ('Richborough Estates') to support the removal of land north of Manchester Road/A57, Hollins Green ('the site') from the Green Belt and its allocation for residential development to provide a minimum of 90 homes in the emerging Warrington Local Plan.**

The development of the site would form a sustainable and natural urban extension to the existing settlement of Hollins Green, which is located adjacent to the north-east of the site. The site presents an excellent opportunity to deliver around 100 high quality family and affordable homes to meet the future housing needs of the Borough, in a sustainable location. The Council has recognised this by proposing the site's removal from the Green Belt and allocation for housing in the emerging Local Plan.

This Development Statement provides an Illustrative Masterplan for the site, which has been informed by the constraints and opportunities presented by the site. It is demonstrated in Sections 6 and 7 of this Statement that the site is suitable, available and achievable to deliver around 100 residential dwellings.

Richborough Estates is committed to working collaboratively with the Council and key stakeholders as the Local Plan is progressed to ensure that the merits of the site are considered fully and that the benefits of developing the site for housing are realised successfully.

# Illustrative Masterplan

-  Application site boundary
-  Existing (retained) tree & hedge and root protection area
-  Indicative proposed planting (see landscape plan for details)
-  Existing Public Right of Way
-  Proposed pedestrian/cycle link
-  Potential for equipped play/LEAP



## The Vision

---

The site offers a unique opportunity to deliver a high quality sustainable residential development that will contribute positively to the housing needs of the Borough whilst maintaining the purpose and function of the Green Belt.

### The vision for the site is:

**To create a high quality landscape-led residential development with enhanced local pedestrian and cycle connectivity. Land north of Manchester Road/A57 will provide new homes within a high quality residential setting to meet local needs, whilst reinforcing the new Green Belt boundaries.**

---

To support the vision, this Development Statement demonstrates that:

- The site represents a logical and wholly appropriate extension to the existing urban area of Hollins Green;
- The site is self-contained and has strong physical boundaries, with Manchester Road/A57 to the south-east and existing housing to the north-east and north-west. The western, south-western and south-eastern boundaries of the site will be reinforced through a well-designed landscape scheme;
- The site does not meet the five purposes of the Green Belt set out in the National Planning Policy Framework and Richborough Estates' own assessment concludes that the site makes a weak contribution to the Green Belt;
- The site is situated in a sustainable location within close proximity to existing services and facilities in Hollins Green and employment opportunities at Birchwood;
- The site can accommodate a high-quality residential development that integrates successfully with the existing built and natural environment, and includes 1.18ha of public open space;
- The development of the site will allow for the provision of good quality cycling and walking routes within the site to connect the site to the wider footway network and existing public right of way to the north-east, promoting connectivity with the existing community;
- The site is suitable, achievable and available for residential development in accordance with national planning policy;
- The site will deliver a range of housing tenures, types and sizes, including a mix of market and affordable housing to meet local needs; and
- There are no identified technical or environmental constraints that would prevent the delivery of housing on the site.



# 1.

# Introduction



# 1. Introduction

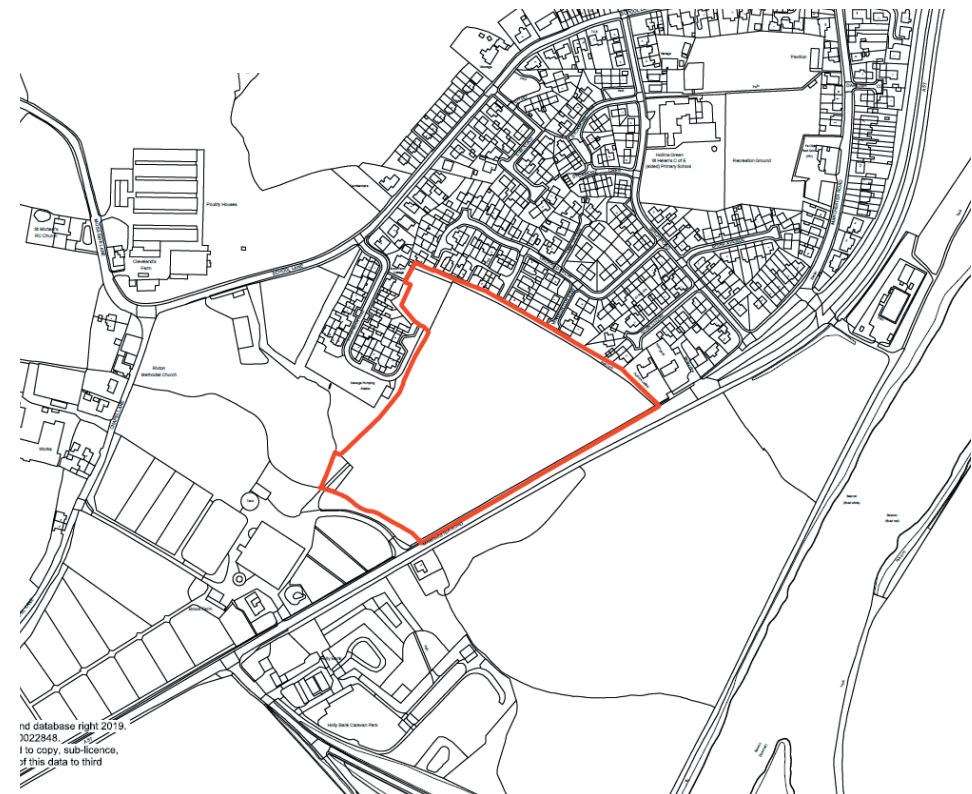
**Land north of Manchester Road/A57 ('the site') represents a logical and wholly appropriate extension to the existing urban area of Hollins Green. The site is sustainable with good access to a range of existing services and facilities and provides an excellent opportunity to deliver around 100 high quality homes which will make a positive contribution towards Warrington's housing needs.**

## **Purpose of the Development Statement**

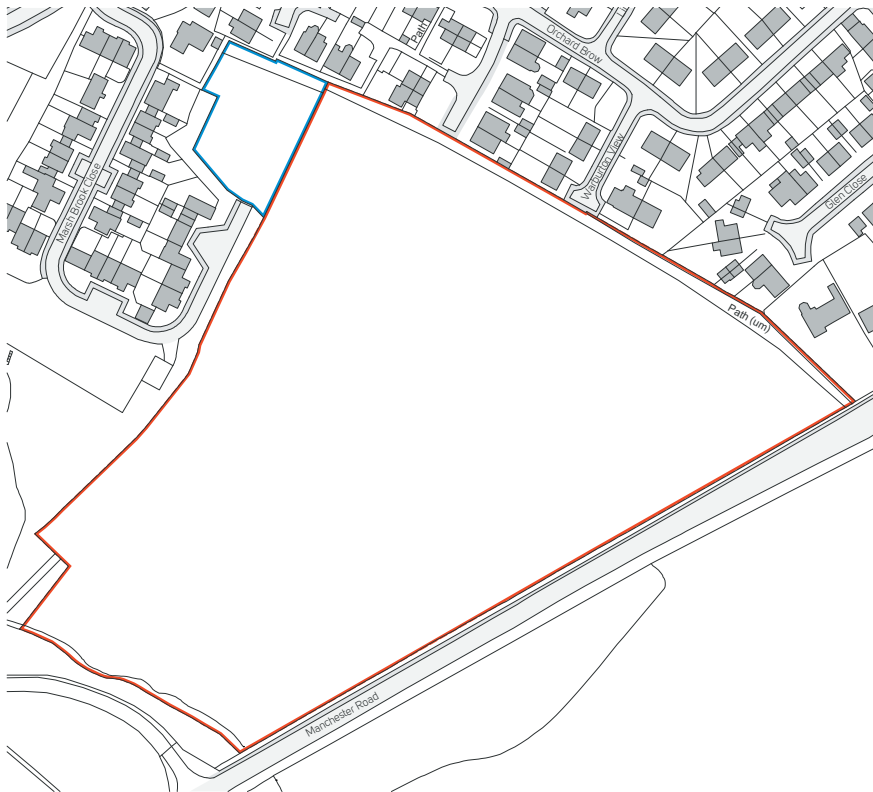
This Development Statement has been prepared by Avison Young on behalf of Richborough Estates Ltd ('Richborough Estates') to support the removal of the Hollins Green site from the Green Belt and allocation for housing within the emerging Warrington Local Plan.

The Proposed Submission Version Local Plan proposes to remove the site from the Green Belt under draft Policy GB1 ('Green Belt'). The site is also proposed for a housing allocation under draft Policy OS4 ('Hollins Green') and is identified as having the potential to deliver a minimum of 90 new homes, with development at the site expected to come forward quickly upon adoption of the Local Plan.

### **Draft Housing Allocation**



### Ownership Plan



This Development Statement relates to the larger parcel of land within the Hollins Green allocation, which is being promoted for residential development by Richborough Estates. The remaining smaller parcel of land in the north-west of the allocation already has outline planning permission for 4 detached dwellings and garages (reference: 2018/32900).

This document articulates clearly the opportunity that exists at land north of Manchester Road/A57 by:

- Setting out Richborough Estates' track record of residential land promotion across the United Kingdom;
- Providing a detailed analysis of the site and its surroundings, and detailing the vision for the site;
- Providing the case for the removal of the site from the Green Belt;

- Detailing the sustainable development principles of the site, including an assessment of the key technical considerations;
- Presenting the vision for the site and the Illustrative Masterplan;
- Assessing the deliverability of the site, demonstrating that the site is suitable, available and achievable in accordance with the National Planning Policy Framework; and
- Concluding that the site will be able to deliver a high quality residential development that can be completed in the short-term, supporting the site's allocation for housing in the emerging Warrington Local Plan.



# 2.

## Richborough Estates' Track Record



## 2. Richborough Estates' Track Record

**Richborough Estates is one of the UK's most successful strategic land promotion companies. It works on behalf of a wide range of landowners, including private individuals, charities, trusts, local councils and Government estate departments, promoting land through the planning system to secure housing allocations and planning permissions for residential development. Richborough Estates then manages the sale of the site from the landowner to the house builder who then builds out the site and delivers homes.**

Richborough Estates was founded in 2003 and the team works in partnership with landowners, local planning authorities and stakeholders to bring land forward for housing. The team comprises a wide range of development experts who deal with land acquisition and planning issues. Richborough Estates' objective is to deliver 'oven-ready' sites to house builders, ensuring that planning permissions are quickly turned into homes for local people. Examples of development partners who have built out Richborough Estates' sites include CALA, Miller, Bellway, Mulberry, Barratt David Wilson, Bovis, Kier, Lion Court and Taylor Wimpey. On Richborough Estates' sites, the average completion rate is 35 dwellings per annum. Richborough Estates' approach is closely aligned with the Government's key objective of significantly boosting the supply of homes.

Richborough Estates is currently promoting approximately 100 sites, totalling around 25,000 homes, through various stages of the planning process across the United Kingdom. Richborough Estates' aim is to leave a lasting legacy for the communities within which it works.

Richborough Estates' experience of residential land promotion places it in an excellent position to be able to state with confidence that land north of Manchester Road/A57 is deliverable.

Residential Masterplan at Maw Green, Crewe



Residential Masterplan at Uplands Mill, Biddulph





# 3.

## Site and Surroundings



## 3. Site and Surroundings

**The site is sustainable and represents a logical and natural extension to the existing built up area of Hollins Green. It comprises agricultural land and is bounded to the north-east and north-west by established housing.**

### Site Description

The site comprises a broadly rectangular parcel of agricultural land extending to approximately 4.27 hectares to the south-west of Hollins Green. The site is currently in use as a single paddock for horse grazing. There is limited vegetation on the site. Occasional groups of trees and shrub are located between the site and the residential dwellings to the north-east, and mature trees associated with Marsh Brook adjoin the site to the west. A hedgerow separates the site and Manchester Road/A57. There are no Tree Preservation Orders located within the curtilage of the site.

The topography of the site slopes gently from 15m AOD at the western site edge to 20m AOD at Elm Road within Rixton to the north-eastern edge of the site.

There are no buildings located within the site. However, there is a public right of way (Rixton with Glazebrook 11) running parallel to the north-eastern boundary of the site from Manchester Road/A57 to Marsh Brook Close. Post and wire fencing restricts public access to the site from the public footpath.

### Site Surroundings

The site abuts the south-western edge of Hollins Green. It is bounded to the north by residential properties at Glen Close, Warburton View and Orchard Brow. The surrounding residential dwellings vary in style and character and include bungalows and semi-detached housing. Adjacent to the north-west of the site is a parcel of greenfield land with outline planning permission for residential development. This land is also contained within the Hollins Green allocation. Further north-west is Marsh Brook Close, in addition to areas of green amenity space and a small area of woodland. Marsh Brook and a buffer of trees are located to the south-west of the site, beyond which is Brook Farm. To the south-east of the site is Manchester Road/A57.

### Vision Context

Owing to the nature of the local topography, natural boundaries of existing vegetation and surrounding residential uses, the visibility of the site is relatively limited and contained.

The site is well contained by dense vegetation located along Marsh Brook to the north-west and existing built form to the north-east. Public views to the site are from the north of the site along the existing public right of way. There are glimpsed views of the site from the south and, in particular, elevated views from the Warburton Toll Bridge. Private views towards the site are restricted to views from the front elevations of properties on Marsh Brook Close (cul-de-sac), and the side and rear elevations of properties on Orchard Brow, Warburton View and Glen Close. However, views are partly interrupted by vegetation and low-level fencing to the north-east and north-west of the site.

Photographs of the Local Area





4.

# Case for Removal from the Green Belt

## 4. Case for Removal from the Green Belt

### Policy Context

#### National Planning Guidance

The NPPF provides the overarching planning framework that underpins decision making and the plan making process in England. 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 ('LPAs') 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.

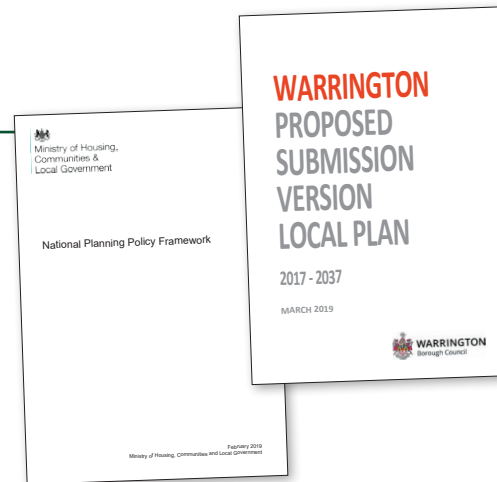
Chapter 13 of the NPPF relates to Green Belt and states that, 'once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans' (paragraph 136).

### Adopted Local Plan

The current Development Plan for the site comprises the Warrington Local Plan Core Strategy (adopted on 21 July 2014). The site is currently designated as Green Belt, in accordance with the Local Plan Core Strategy (Policy CS 5). The footpath running adjacent to the north-eastern boundary of the site is designated under Policy MP 3 as 'Active Travel'.

The history of the Warrington Green Belt is set out in detail in the Arup Green Belt Assessment ('GBA'), dated 21st October 2016. The Green Belt around Warrington was first formally introduced in the Cheshire Structure Plan (adopted in 1979) with the extent broadly defined on the Key Diagram. Later alterations of the Structure Plan did not change the extent of the Green Belt.

The Unitary Development Plan ('UDP') (2006) was the first single comprehensive statutory development plan for the Borough and was the first Local Plan to formally define the Green Belt. The UDP made minor changes to the Green Belt introduced in 1979 in the Cheshire Structure Plan.



The Local Plan Core Strategy was based on a 'regeneration first' approach which was required to be consistent with the now revoked North West Regional Spatial Strategy ('RSS'), which identified no strategic change to Green Belt boundaries in Warrington before 2021.

In summary, Warrington's Green Belt was designated in 1979 and largely remains the same today, save for minor changes introduced by the UDP. The Green Belt shrink wraps the urban area because it was based upon out of date maximum housing requirements which were required at the time the Green Belt designation was made. In accordance with national planning policy, housing requirements are now minimum requirements and as Warrington's Green Belt boundary has seen only minor amendments since it was first established in 1979 there is a clear need to review the Green Belt boundaries in the emerging Local Plan to ensure that Warrington's maximum housing requirements can be delivered in full.

### Emerging Local Planning Policy

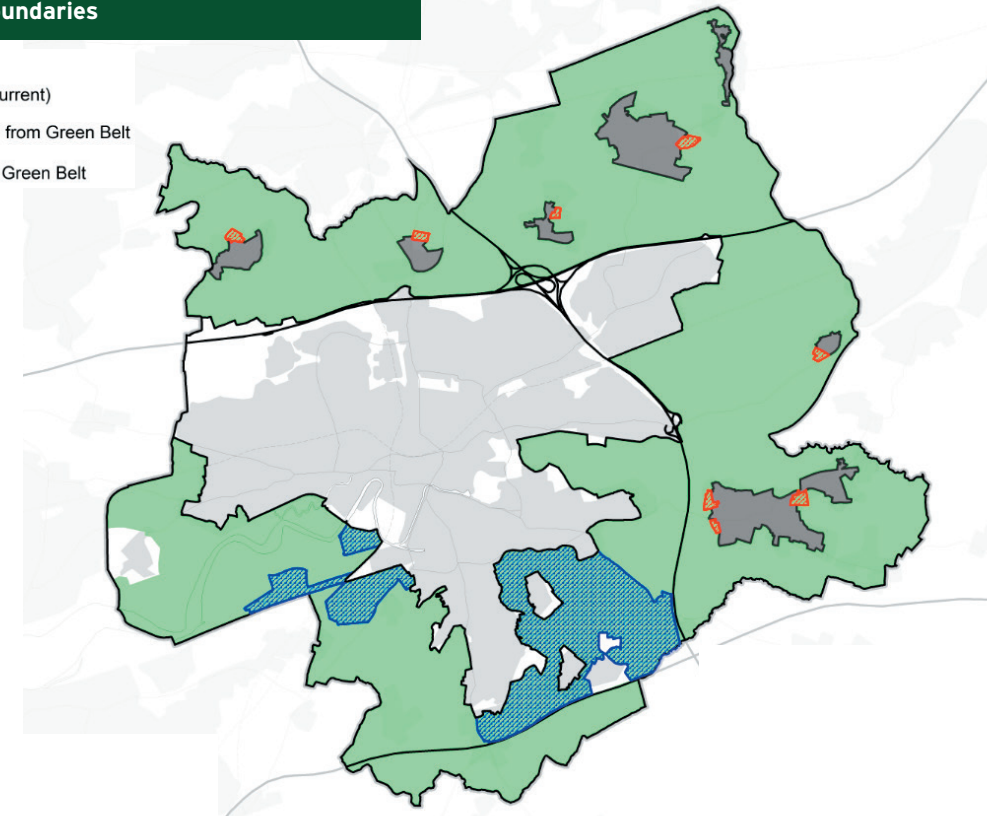
#### Background

Following the High Court ruling in February 2015, which quashed the housing target in the adopted Warrington Local Plan Core Strategy, Warrington Borough Council ('WBC') sought to update its housing policies. It became clear that the Borough's needs going forward could not be met without a full review of the adopted Core Strategy.

In October 2016, the Council's Executive Board agreed to commence the process of reviewing the existing Warrington Local Plan and consultation on the Preferred Development Option ('PDO') was undertaken between July and September 2017. Approximately 4,500 responses were received to the PDO consultation, a significant proportion of which related to the scale and location of development proposed and Green Belt release.

### Amended Green Belt Boundaries

- Green Belt
- Inset Settlement Boundaries (Current)
- Settlement Allocations removed from Green Belt
- Allocations to be removed from Green Belt



Since the PDO consultation, WBC has prepared a number of evidence base studies to demonstrate that the emerging Local Plan is based on the most up to date assessment of Warrington's development needs; that all options for meeting these needs have been appropriately considered; and that the infrastructure requirements to support new development are understood and can be delivered.

#### Draft Policy DEV1 - Housing Delivery

Draft Objective W1 of the Proposed Submission Version Local Plan sets out a clear, immediate and critical need for housing in 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). The approach adopted is 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 Proposed Submission Version Local Plan 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 GB1 - Green Belt

Draft Policy GB1 relates to the Green Belt and identifies land to be removed from the Green Belt, Inset Settlements and Green Belt Settlements. Part 3 of the policy identifies land proposed to be removed from the Green

Belt and Figure 6 shows the amended Green Belt boundaries. The land proposed to be removed from the Green Belt is:

- Warrington Waterfront;
- Garden Suburb
- South West Urban Extension
- Land at Burtonwood
- Land at Croft

- Land at Culcheth
- Land at Hollins Green
- Land at Lymm
- Land at Winwick

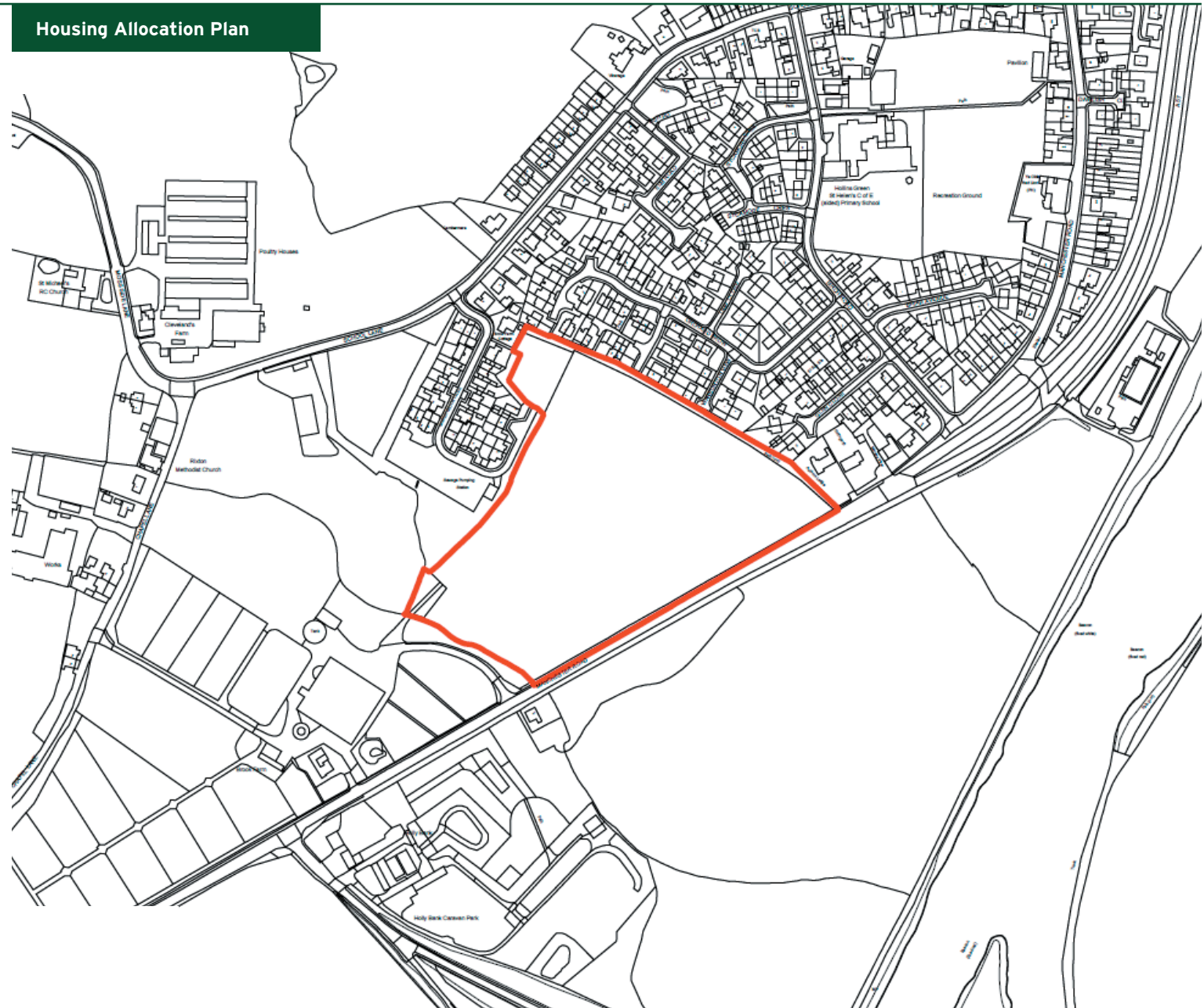
Land at Hollins Green referenced at Part 3g is Richborough Estates' site and is proposed for removal from the Green Belt.

**Housing Allocation Plan**

**Draft Policy OS4 - Hollins Green**

The site comprises the larger section of the Hollins Green (Policy OS4) allocation within the Proposed Submission Version Local Plan. Draft policy OS4 allocates the wider site for residential development for a minimum of 90 homes.

The accompanying text to Policy OS4 robustly justifies the removal of the site from the Green Belt, stating that the site only makes a moderate contribution to the Green Belt. Furthermore, draft Policy OS4 confirms that the site performed well in terms of the assessment against the objectives of the Local Plan, the requirements of the NPPF and the Local Plan's Sustainability Appraisal. Draft Policy OS4 creates an appropriate mechanism for residential development to come forward at the site in line with the objectives of national and emerging local planning policy.



## The Need to Release Green Belt Land Through a Local Plan Review

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 137 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 reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph (136), and whether the strategy:

- **Makes as much use as possible of suitable brownfield sites and underutilised land;**

WBC has undertaken extensive masterplanning work to try to unlock significant additional urban capacity over and above that identified in the Council's Brownfield Register and SHLAA. An Urban Capacity Study was prepared by WBC in 2016, updated in 2017 and 2019. In identifying land to meet Warrington's need for housing and employment, the Council has sought to maximise the capacity of the existing area to accommodate new development, in order to demonstrate that all reasonable options have been identified for meeting development requirements before releasing Green Belt.

The urban capacity figure is a product of the updated SHLAA (2018) figure and the updated masterplanning work undertaken in partnership with Warrington & Co. The assessment identifies an urban capacity for 13,726 dwellings.

- **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; and**

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. It is clear from the Council's evidence base that through the review of the density requirements that Green Belt release is required to meet the Council's Objectively Assessed Need in full.

In relation to specific density requirements, as set out in the Urban Capacity Assessment 2019, Richborough Estates reserves the right to comment on these further following a comprehensive and detailed review of the requirements.

- **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. Furthermore, the Greater Manchester Spatial Framework ('GMSF') is stalling generating additional pressure on Warrington to deliver housing.

Richborough Estates agrees that WBC has 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.



### **Five Purposes of the Green Belt**

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The Green Belt Assessment (GBA) (Additional Sites Assessments - Settlements) (May 2018) prepared by WBC made an assessment of the site (reference: R18/P2/151) against the five purposes of the Green Belt in line with paragraph 134 of the NPPF. The GBA assessed the site as having an overall moderate contribution to the Green Belt.

Richborough Estates fully supports the Council's decision to remove the site from the Green Belt and allocate it for housing in the Proposed Submission Version of the emerging Local Plan. However, Richborough Estates has undertaken its own assessment of the site against the 5 purposes of the Green Belt and disagrees with the GBA conclusions. Richborough Estates' assessment concludes that the site makes a weak contribution to the Green Belt and a summary of the assessment is provided opposite.

**In summary, the site is not required to maintain the purposes of the Green Belt in this location. Therefore, Richborough Estates strongly supports the site's removal from the Green Belt and allocation for housing in the Proposed Submission Version Local Plan.**

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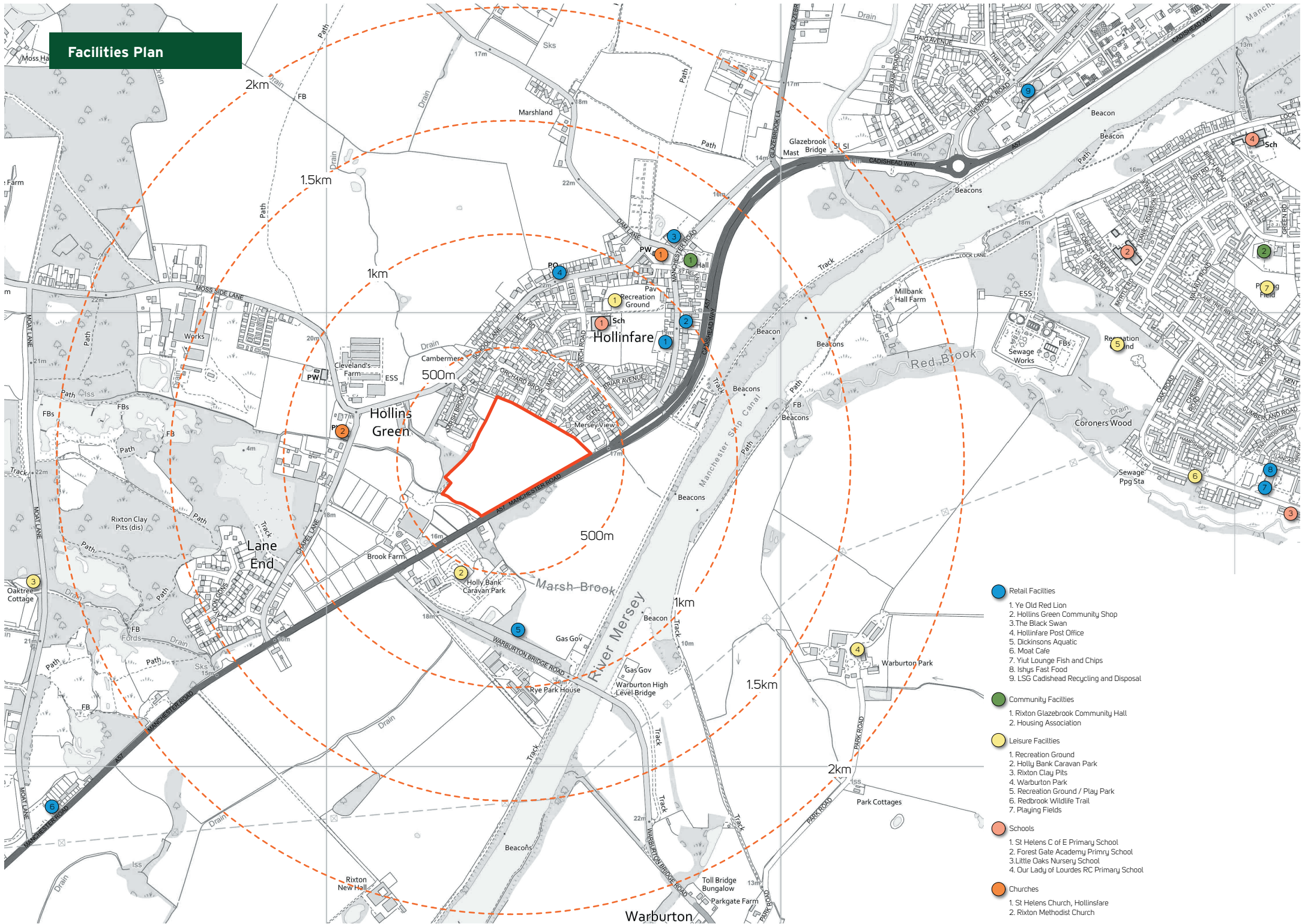
Purposes of the Green Belt	GBA (2018) Parcel Reference R18/P2/151	Richborough Estates' Assessment
<b>Purpose 1: To check the unrestricted sprawl of large built-up areas</b>	No contribution	Agree - No contribution
<b>Purpose 2: To prevent neighbouring towns merging into one another</b>	Weak contribution	No / Weak Contribution - with the exception of a small area to its south-western boundary, the site identified is enclosed on all sides by existing man-made boundaries (Warburton View, Orchard View, Marsh Brook Close, Brook Farm and the A57). It therefore plays no role in maintaining separation with the nearest town of Warrington (Urban Area) some 3.4km to the west. Furthermore, there are several other areas of development between the site and the Warrington Urban Area (namely Hollybank Caravan Park and the commercial and residential development around Chapel Lane), which prevent even the perception of separation between the site and Warrington when traveling along the A57.  Additionally, the site does not contribute towards maintaining separation between Hollins Green and Cadishead to the north-east, given the site's position on the other side of Hollins Green.
<b>Purpose 3: To assist in safeguarding the countryside from encroachment</b>	Strong contribution	Weak contribution - It can be acknowledged that by virtue of there being a housing development on a Green Belt site, there is encroachment into the countryside. However, the same is true of any of the proposed sites to be released from the Green Belt.  With the exception of a small part of the south-western boundary, the site identified is enclosed on all sides by existing man-made boundaries (Warburton View, Orchard View, Marsh Brook Close, Brook Farm and the A57). All of these boundaries are durable and would be able to prevent future encroachment.  As such, it is considered the site north of Manchester Road/ A57 can only be assessed as having a weak contribution towards safeguarding the countryside from encroachment.
<b>Purpose 4: To preserve the setting and special character of historic towns</b>	No contribution	Agree - No contribution
<b>Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict another urban land</b>	Moderate contribution	Agree - Moderate Contribution - Richborough Estates welcomes the recognition in the GBA that all Green Belt sites make the same level of contribution towards this purpose.
<b>Overall Assessment</b>	Moderate contribution	Weak contribution



# 5.

## Sustainable Development Principles

# Facilities Plan



- Retail Facilities
  1. Ye Old Red Lion
  2. Hollins Green Community Shop
  3. The Black Swan
  4. Hollinfare Post Office
  5. Dickinsons Aquatic
  6. Moat Cafe
  7. Ylut Lounge Fish and Chips
  8. Ishys Fast Food
  9. LSG Cadishead Recycling and Disposal
- Community Facilities
  1. Rixton Glazebrook Community Hall
  2. Housing Association
- Leisure Facilities
  1. Recreation Ground
  2. Holly Bank Caravan Park
  3. Rixton Clay Pits
  4. Warburton Park
  5. Recreation Ground / Play Park
  6. Redbrook Wildlife Trail
  7. Playing Fields
- Schools
  1. St Helens C of E Primary School
  2. Forest Gate Academy Primary School
  3. Little Oaks Nursery School
  4. Our Lady of Lourdes RC Primary School
- Churches
  1. St Helens Church, Hollinsfare
  2. Rixton Methodist Church

## 5. Sustainable Development Principles

### A Sustainable and Accessible Site

The site is sustainably located and is within close proximity to a range of local services and amenities which are a short walking or cycling distance of the site.

St Helen's Church of England Primary School is within a 360m walking distance of the centre of the site. The pedestrian route to the school is alongside and across lightly trafficked residential roads with a 20mph speed limit. A post office is located around 530m to the north of the site, whilst a local community shop lies just 560m to the north-east. The Ye Olde Red Lion pub is located just over 500m from the site, whilst the Black Swan pub is just over 700m from the site.

The nearest bus stops are located within 400m of the centre of the site providing access to two routes; service numbers 40B and 100. Service number 100 provides frequent hourly services on weekdays to Warrington and Manchester City Centre, via Cadishead, Irlam, Eccles and Salford.

The same service is provided at a half-hourly frequency from stops adjacent to the Black Swan pub, some 340m or so further north along Manchester Road.

### Economic Role

The development of the site for housing will make a positive contribution to building a strong, responsive and competitive economy, in line with national planning policy. The development will create a number of jobs locally during the construction phase, in addition to creating indirect job opportunities within the immediate surrounding area and wider Borough as a result of investment from prospective residents. The delivery of housing at the site will also contribute positively to increasing Council tax income and revenue from New Homes Bonus for WBC.

### Social Role

The development of the site will help to support a strong, vibrant and healthy community through the provision of much-needed market and affordable housing on a site which is in a suitable and sustainable location, available to be developed now and is achievable in that housing could be delivered on site within the next 5 years. The development of the site will allow for a range of housing types, tenures and sizes to be delivered within the locality, contributing positively to the housing mix in the area. The development of the site will also deliver enhancements in the form of public open space and recreation at the site through the delivery of 1.18ha of open space. There is also potential to deliver 0.05ha of equipped play space on site. This social objective is important in achieving Richborough Estates' aim of leaving a lasting legacy for the communities within which it works.



## Environmental Considerations

**Richborough Estates has commissioned a highly experienced technical team to assess the physical suitability of the site to accommodate residential development immediately following the adoption of the emerging Local Plan.**

### Ecology

An Ecological Impact Assessment Report has been prepared by RammSanderson Ecology following a Site Walkover Survey conducted in March 2019.

The site is over 0.5km from the nearest Site of Biological Interest. Although the site falls within the Impact Risk Zone Rixton Clay Pits Site of Special Scientific Interest ('SSSI'), the proposed number of residential units is not classified as being of interest to the SSSI.

Two Habitats of principal importance were recorded on site comprising the hedgerow and Marsh Brook. However, the hedgerow does not qualify under the Hedgerow Regulations 1997. All other habitats are common and widespread and offer limited ecological value. One tree on site was assessed as offering bat roosting potential, however, this tree will not be impacted by development as it lies adjacent to Marsh Brook.

The majority of the habitats on site are considered sub-optimal for great crested newts ('GCN'), and impacts on terrestrial phase amphibians are considered to be extremely unlikely. Furthermore, the habitats

on site do not provide areas suited to breeding Schedule 1 birds, with impacts upon breeding birds anticipated to be negligible. The site was also considered to be of very limited value for reptiles and no badger setts or field signs of badgers were recorded on site. Additionally, no impacts will occur to water vole and other species as a result of the proposal.

Given the low biodiversity value of the poor semi-improved grassland which dominates the site, it is considered that the development offers opportunities to provide a net gain of biodiversity on site through the creation of natural green spaces.

The Ecological Impact Assessment report concludes that a residential development could be accommodated at the site, as there are no physical limitations in respect of ecology. A future planning application would be supported by a Phase 1 Ecological Assessment and protected species survey. All ecological features would be protected by suitable standoff distances and enhancement measures as necessary.



### Flood Risk and Drainage

Professional flood risk and drainage advice has been sought from qualified environmental consultants BWB Consulting Limited.

According to the Environment Agency Flood Map for Planning, the site is located entirely within Flood Zone 1, land defined as having less than a 1 in 1000-year annual probability of river or sea flooding. The nearest Environment Agency Main Rivers are the Red Brook and an Unnamed Ordinary Watercourse, located approximately 500m and 450m to the east of the site respectively. Both rivers are connected to the Manchester Ship Canal. The Marsh Brook, an ordinary watercourse, crosses the southern proportion of the site from west to east and enters the Manchester Ship Canal, approximately 250m to the south west of the site.

The Manchester Ship Canal is a canalised watercourse and therefore its flooding mechanisms are more like a watercourse than a typical canal. The Flood Zone 2 extent associated with the Manchester Ship Canal extends up to the A57 adjacent to the eastern site boundary.

To manage the increased impermeable area and subsequent increased surface water runoff due to the development, an appropriate Surface Water Management Strategy will be developed. It is anticipated that surface water from the site will continue to outfall to the Marsh Brook to the south of the site. The discharge to the Marsh Brook will be restricted to an equivalent greenfield rate, to prevent the development increasing flood risk outside of the site boundary. The attenuated surface water will be stored on site through the use of Sustainable Drainage Systems ('SuDS'). These storage features will be appropriately sized and designed to meet the appropriate guidance, including considerations for climate change.

Overall, the site is entirely appropriate for residential development in flood risk terms.

### Landscaping

Tyler Grange was commissioned to provide a high level landscape and visual overview for the site. In light of the landscape character, adopted and emerging policy alongside the associated evidence base, Tyler Grange considers that the site is suitable for residential development. The site does not lie within a landscape designation at a national, regional or local level. Furthermore, in respect of the Green Belt designation, the site is considered capable of being developed without detrimentally undermining the Green Belt.

Whilst development of the site would introduce built form onto a piece of land which is currently undeveloped, a sensitively designed landscape scheme can assimilate a residential proposal with its surroundings and not result in a material change to the character and appearance of the area.

In relation to the visual environment, the site is well contained by dense vegetation located along Marsh Brook to the north-west and existing built form to the north-east. Proposed built form on the site will be concentrated adjacent to the existing built form to ensure

that the site reads as part of Hollins Green, rather than a separate cluster of built form in more distant and middle distant views from the south, particularly from the Warburton Toll Bridge.

Whilst placing development within the northern and eastern edges of the site will alter the experience of travelling along the public footpath, the current experience contains existing built form within Hollins Green and the route affected is currently linear in nature, enclosed by a post and wire fence on one side and residential development on the other. There is an opportunity to improve this route through providing connections into the site, increasing its recreational value and providing soft landscaping to mitigate the proximity of new built form.

There are no significant landscape or visual constraints that would preclude the development of the site, subject to appropriate design measures and an appropriate landscape framework at the planning application stage.



### Highways

Professional transport consultant, Hub Transport Planning, has been appointed to assess the highway and access considerations at the site.

A single vehicle access point for the development could be taken from Manchester Road/A57. Additional pedestrian and cycle access could also be provided via Warburton View and Marsh Brook Close.

The proposed access from Manchester Road will take the form of a priority T-junction with ghost-island right-turn lane. Preliminary tests indicate that such a junction will have sufficient capacity to cater for background and committed development growth to a suitable design year. The site access junction can accommodate a refuse lorry, which is typically the largest vehicle that might be expected to access site on a week-to-week basis.

A development of around 100 dwellings would be expected to generate around 50 to 55 two-way peak hour vehicle trips; just less than one vehicle movement per minute. The site access strategy can comfortably accommodate such levels of traffic and the impact of the development traffic is such that it will be very low on the local and wider highway network away from the site access.

### Ground Conditions

There are no active or historic landfills located on or in the immediate vicinity of the site. According to the Coal Authority's mapping service, the site is not located within a Coal Mining Reporting Area indicating no previous mining activity or previously worked areas have occurred in the vicinity of the site. The site is greenfield land currently used for grazing, and as such the potential for contamination is unlikely.

### Utilities

There are no utilities constraints that would prevent the development of the site. Within the vicinity of the site there are accessible utilities infrastructure comprising electricity, gas, broadband, water and sewer drainage.

### Archaeology and Heritage

There are no heritage designations (Scheduled Monuments, Grade I, II\*, II Listed Buildings, Conservation Areas, Registered Parks and Gardens or Registered Battlefields) within the site boundary. Three Grade II Listed Buildings are located within 500m of the site, the closest of which is the Milestone located approximately 290m north-east. Additionally, the Grade I Listed Old Church of Saint Werburg is located approximately 1km south-east of the site. The delivery of a sensitive development with appropriate screening from designated heritage assets would not adversely affect the setting of any heritage place.

### Air and Noise

The site is not located within or in close proximity to an Air Quality Management Area ('AQMA'). The closest AQMA is located approximately 2.9km north of the site on the M62 which is designated due to its exceedance of NO<sub>2</sub> concentrations. The construction and future occupation of the site will consider the impacts of the proposals on local air quality within the Borough. It is not considered that air quality impacts would preclude the future development of the proposed site.

The main source of existing noise would be traffic noise emanating from Manchester Road adjacent to the site's south-eastern border. It is not considered that the existing noise environment would preclude development of the site coming forward.

### Summary

**The technical reports demonstrate that there are no significant ecological, flood risk and drainage, landscaping, highways, ground conditions, utilities, archaeology and heritage, air quality and noise constraints that would prevent residential development from coming forward at the site in the short-term.**



# 6.

## Vision for the Site and Masterplan

## 6. Vision for the Site and Masterplan

The site has excellent potential to deliver an attractive residential development comprising a minimum of 90 new homes within a high quality residential setting and in close proximity to existing services and amenities in Hollins Green.

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The site presents an opportunity to deliver an integrated, desirable and high quality residential development that meets the needs of the local community and provides a large proportion of enhanced public open space on site.

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### **The Vision**

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**To create a high quality landscape-led residential development with enhanced local pedestrian and cycle connectivity. Land north of Manchester Road/A57 will provide new homes within a high quality residential setting to meet local needs, whilst reinforcing the new Green Belt boundaries.**

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The development will:

- Deliver high quality new homes: The development will comprise high quality homes, including market and affordable housing, which recognise the existing form and quality of Hollins Green and are sensitive to the surrounding local area;
- Be sensitively designed and integrate successfully into the surroundings: The development at the site will be of a high quality design that will complement and enhance the existing environment and create a good standard of amenity and living environment;
- Achieve a choice of housing: The development will deliver a range of housing tenures, types and sizes, including family homes with gardens, homes for first time buyers and lifetime homes to provide for older persons on site;
- Invest in the community: The development of the site will represent significant private sector investment and will contribute positively to the creation of additional direct and indirect employment both during and after the development;
- Deliver enhanced public space on site: The development of the site will include 1.18ha of enhanced public open space to the south-west adjacent to the strengthened Green Belt edge. There is the potential for a Local Equipped Area for Play ('LEAP') or a Village Park to be located within this area;
- Create a safe and desirable place to live: The residential development at the site will be sensitively designed to ensure the creation of a safe and attractive environment that discourages crime and builds upon the strength of the local community;
- Provide 30% affordable housing on site: The development will achieve 30% affordable housing at the site;
- Provide good cycling and pedestrian routes: The development will provide good cycling and walking routes across the site that connect to the wider existing footway network and public right of way to the north and provide connectivity with the existing community; and
- Contribute to the provision of community facilities: The development will contribute towards the provision of additional primary and secondary school places, and the provision of primary care capacity.

## Site Opportunities and Constraints Plan

-  Existing vegetation to be retained where possible
-  Potential to strengthen the greenbelt edge with new planting
-  Approved adjacent residential development
-  Pumping station
-  Existing Public Right of Way
-  Potential for new link to the existing community
-  Opportunity to create a central nodal feature
-  Anticipated location of single point of vehicular access
-  Low point of the site being suitable for surface water attenuation features



## Site Opportunities and Constraints

The vision for the site originates from careful analysis of its characteristics, context and opportunities and constraints.

The site is adjacent to Manchester Road, which bounds the site to the south-east. Manchester Road is a wide two-lane single carriageway local distributor road as it passes the site, with footway provision along the northern side of the road. The road forms a key link running east from Liverpool to Lincoln via Warrington, Cadishead, Irlam, Patricroft, Eccles, Salford and Manchester. Safe and viable highway access to the site could be taken from Manchester Road, with the opportunity to enhance pedestrian and cycle access via Warburton View and Marsh Brook Close.

Existing trees and hedgerows to the western, south-western and south-eastern edge of the site will be retained and enhanced to strengthen the new Green Belt edge. The area of public open space to the south of the site will create a soft edge with the Green Belt beyond the site, whilst accommodating a children's play area and surface water attenuation features. There is the potential for different planting strategies along the Manchester Road frontage, the new Green Belt edge and the public right of way corridor. Further planting along streets and within private frontages could reinforce different street typologies at the site.

The public right of way 'Rixton with Glazebrook 11' runs along the north-eastern boundary of the site connecting Manchester Road to Marsh Brook Close. There is potential to provide an enhanced landscaped buffer to the north-east of the site adjacent to the public right of way to maintain amenity for those using the route. There are also opportunities for connections to the public right of way and for a new footpath network within the open space areas on site. High quality housing will create positive frontages

to the public right of way corridor and the new urban edge providing natural surveillance. The proposed pedestrian and cycle links at the site will extend the network of publicly accessible routes through the site into new recreational greenspaces which will benefit existing and future residents.

The site slopes gently from north to south towards Marsh Brook which crosses the southern part of the site from west to east. The site is located entirely within Flood Zone 1. Owing to the natural topography of the site, there is the potential to create a surface water attenuation basin to the south of the site at the existing low point as part of a sustainable drainage system.

An analysis of the site has been carried out to determine the principal constraints and opportunities that underpin the vision for the development. The key constraints and opportunities presented by the site include:

- Enhanced connectivity between the site and its surroundings to promote sustainable transport for pedestrians and cyclists;

- The need to ensure that the proposed development has an appropriate interface with Manchester Road;
- The need to ensure that the residential amenity of existing and prospective residents is maintained through effective landscaping;
- Reinforced new Green Belt boundaries and an enhanced public right of way; and
- The inclusion of an area of open space in the southern part of the site for recreational use and to provide a soft edge with the new Green Belt beyond the site.

There is the potential on the site to develop a high quality landscape-led scheme set out around an efficient landscape structure and with opportunities for the creation of character to inform legibility and a sense of place, whilst reinforcing the new Green Belt boundaries and improving connectivity with the established settlement of Hollins Green.



**Development Framework**

The concepts that underpin the Illustrative Masterplan respond directly to the characteristics of the site. The following key concepts have been identified.

**Concept Plans**

**Movement**

There is potential to create a simple hierarchy of street typologies that form a legible movement network. The links and streets would converge at the central 'Arrival Node', with opportunities for connections to the public right of way and for the creation of a new footpath network within open space areas to facilitate exercise, dog walking and leisure walks. The connection along the existing street network also offers an opportunity for a safe route to school for new residents.

- Existing Public Right of Way
- Potential for new link to the existing community
- Anticipated location of single point of vehicular access
- Opportunity to create a central nodal feature
- "Crescent" forming internal loop
- "Lanes" serving development zone edges

**Green Infrastructure**



- Existing vegetation to be retained where possible
- Potential to strengthen the greenbelt edge with new planting
- Potential for planting within and at the edges of the development zone
- Low point of the site being suitable for surface water attenuation features

As part of the site's development, there is potential to reinforce the existing trees along the new Green Belt boundaries with additional tree planting. The area of open space to the south of the site could accommodate a children's play area and surface water attenuation features. The 'Arrival Node' could include new planting as part of a landscape character approach. Different street typologies could be reinforced by planting along streets and within private frontages and various planting strategies could be employed along the Manchester Road frontage, to the urban edge and within the public right of way corridor.







**Concept**



- Potential to strengthen the greenbelt edge with new planting
- Development Cells
- Opportunity to create a central nodal feature
- Existing Public Right of Way
- Potential for new link to the existing community
- Anticipated location of single point of vehicular access
- "Crescent" forming internal loop
- "Lanes" serving development zone edges
- Low point of the site being suitable for surface water attenuation features

The proposed development would comprise a landscape-led scheme set around an efficient structure and with opportunities for the creation of character to inform legibility and a sense of place.

# Illustrative Masterplan

-  Application site boundary
-  Existing (retained) tree & hedge and root protection area
-  Indicative proposed planting (see landscape plan for details)
-  Existing Public Right of Way
-  Proposed pedestrian/cycle link
-  Potential for equipped play/LEAP



Open Space Provision Plan

**Illustrative Masterplan**

An Illustrative Masterplan has been prepared by nineteen47 on behalf of Richborough Estates. The Illustrative Masterplan shows that the site can accommodate 100 dwellings, whilst also retaining 1.18ha of public open space at the south-west of the site. The Illustrative Masterplan demonstrates that a minimum density of 30 dwellings per hectare can be achieved at the site.

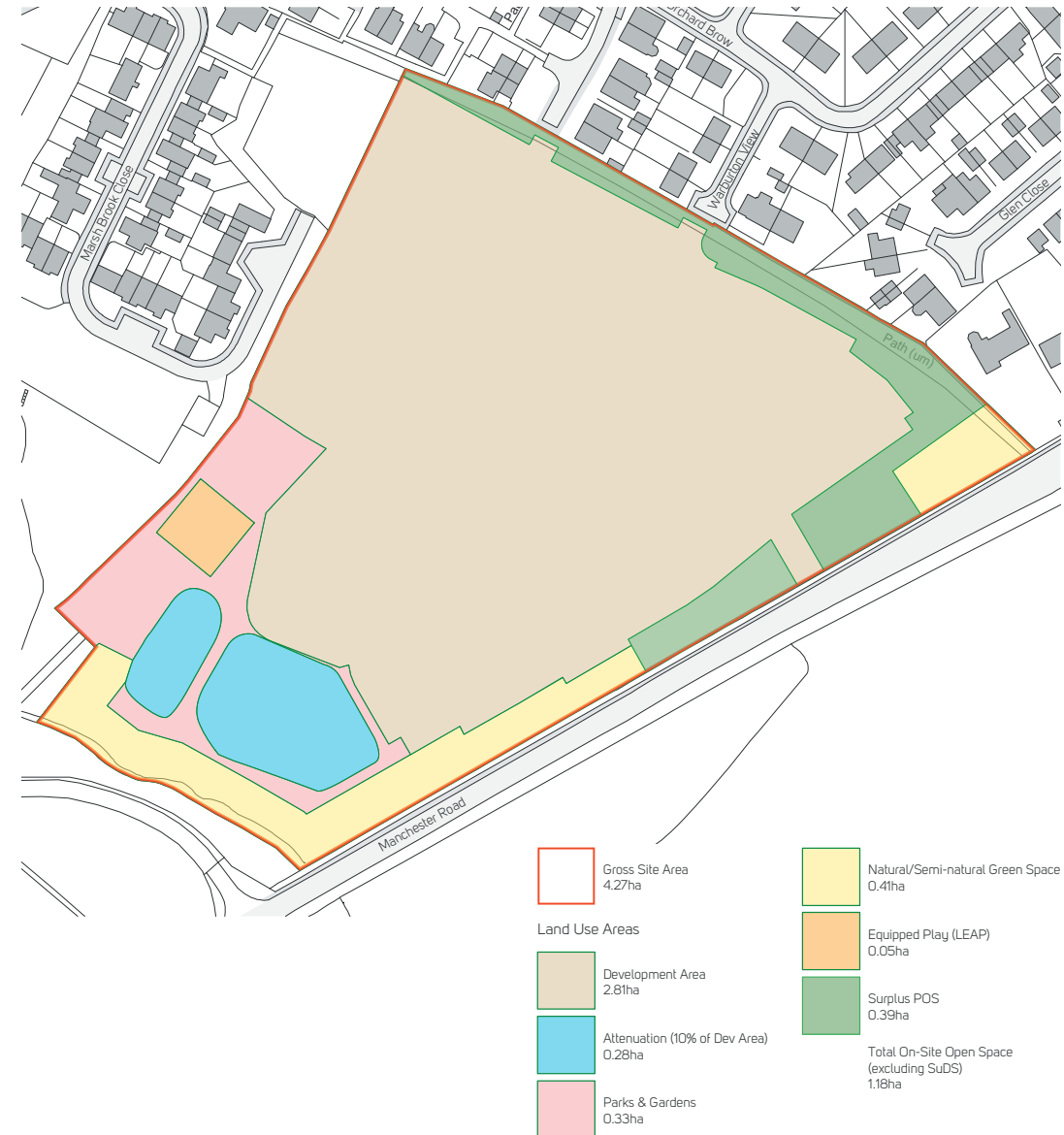
Vehicular, pedestrian and cycle access to the site will be created to the south-east off Manchester Road/A57. The proposed access from Manchester Road/A57 will take the form of a priority T-junction with ghost-island right-turn lane. The houses at the site will be accessed via private drives taken off the internal road network.

A pedestrian and cycle link will be created to the north-west of the site from Marsh Brook Close connecting to the internal estate roads and to the proposed pedestrian and cycle link running through the public open space to the south of the site. A pedestrian and cycle link will also be created through the site to Warburton View to the north, enhancing links to the wider area.

The internal estate roads are situated to the north of the site and do not cross the proposed public open space located at the southern part of the site, which is highlighted as having the potential to accommodate a LEAP or Village Park. The area to the south of the site will be managed and maintained to create a usable and attractive amenity space for prospective residents, which will create a soft edge with the Green Belt beyond the site.

The Green Belt edge to the west, south-west and south-east will be strengthened through the retention of existing trees and hedges, in addition to new planting as detailed on the Illustrative Masterplan. This new planting will reinforce the new Green Belt boundaries.

Landscaping along the south and south-east boundary of the site will restrict views into the site from Manchester Road/A57. A landscaped buffer will also be retained and enhanced to the rear of the residential properties to the north of the site and adjacent to the existing public right of way.





# 7.

## Deliverability of Development

## 7. Deliverability of Development

**The NPPF emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed, in line with the Government's objective to significantly boost the supply of homes. This section of the Development Statement demonstrates that the site is suitable, available and achievable and is very well positioned to meet the growth needs of the Borough in accordance with the NPPF.**

**To be considered deliverable, sites should:**

- **Be Suitable:**  
A site is considered suitable for development if it offers a suitable location for development now.
- **Be Available:**  
A site is considered available if it is available for housing now.
- **Be Achievable:**  
A site is considered achievable where there is a realistic prospect that housing will be delivered on the site within five years.

### **A Suitable Site**

The site is a self-contained parcel of land measuring approximately 4.27 hectares located immediately adjacent to the existing settlement boundary of Hollins Green, with immediate access to the strategic road network (Manchester Road/A57). Hollins Green is identified as an 'Inset Settlement' in the emerging Local Plan meaning that it is excluded from the Green Belt and is a suitable location for appropriate and sustainable development. The village benefits from a good level of local facilities and public transport links, and is also within ease of access to employment opportunities at Birchwood.<sup>1</sup> Therefore, the site is an appropriate and sustainable location to direct a proportion of Warrington's future housing growth.

The site represents a sustainable and logical option for Green Belt release owing to its strong physical and defensible boundaries to the west, south-west and south-east, and its location immediately adjacent to the south-west of Hollins Green. The site is proposed for Green Belt release in Policy GB1 of the emerging Local Plan.

The site is considered to be suitable for housing in Policy OS4 of the emerging Local Plan, within which the site is allocated for residential development comprising a minimum of 90 dwellings. The Illustrative Masterplan demonstrates that the site can accommodate 100 dwellings, whilst also retaining 1.18ha of public open space at the south of the site and strengthening the new Green Belt boundaries.

The site represents a suitable and excellent development prospect given its ability to deliver housing in a sustainable location, well related to the existing urban area, to help meet current and planned housing needs within the Borough. The development of the site will deliver much needed housing in the short-term, in accordance with Policy OS4, without having to rely on the delivery of new infrastructure. Therefore, the site is suitable for development.

### **An Available Site**

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Richborough Estates has entered into an agreement with the landowners to actively promote the site for residential development. Richborough Estates has a proven track record of facilitating the delivery of high quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough Estates has promoted the site for residential development throughout the Local Plan process and will continue to do so to commit to its delivery early within the Plan period.

### **An Achievable Site**

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The site could accommodate a minimum of 90 dwellings, as shown on the Illustrative Masterplan for the site and as detailed in Policy OS4.

Policy OS4 states that development is expected to come forward quickly upon adoption of the Local Plan and that development will be completed in full within the first 10 years of the Plan period. This Development Statement demonstrates that there are no technical or physical constraints preventing the site from coming forward for development. Therefore, there are no technical constraints that would prevent or delay the site from coming forward within the first 5 years of the Plan period. The site is therefore available for development in the immediate term, supporting the site's allocation in the Plan.

The site presents an opportunity to make an important contribution towards the housing requirement in Warrington on land proposed for Green Belt release and allocated for residential development in the emerging Local Plan. Consequently, the site is achievable.

### **Summary**

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**This section of the Development Statement demonstrates successfully that the site is suitable, available and achievable and can deliver residential development in accordance with Policy OS4 within the first 5 years of the Plan period. It is proposed for Green Belt release and identified as a housing allocation comprising a minimum of 90 homes within the emerging Warrington Local Plan.**

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






# 8.

# Conclusions

# Illustrative Masterplan

-  Application site boundary
-  Existing (retained) tree & hedge and root protection area
-  Indicative proposed planting (see landscape plan for details)
-  Existing Public Right of Way
-  Proposed pedestrian/cycle link
-  Potential for equipped play/LEAP



## 8. Conclusions

**The site offers an excellent opportunity to contribute positively towards meeting the future housing needs of Warrington. This Development Statement presents the case for removing the site from the Green Belt and allocating the site for housing development, as proposed within the Proposed Submission Version Local Plan.**

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In summary, this Development Statement has illustrated that:

- The site represents a logical and wholly appropriate extension to the existing urban area of Hollins Green;
- The site is self-contained and has strong physical boundaries, with Manchester Road/A57 to the south-east and existing housing to the north-east and north-west. The western, south-western and south-eastern boundaries of the site will be reinforced through a well-designed landscape scheme;
- The site does not meet the five purposes of the Green Belt set out in the National Planning Policy Framework and Richborough Estates' own assessment concludes that the site makes a weak contribution to the Green Belt;
- The site is situated in a sustainable location within close proximity to existing services and facilities in Hollins Green and employment opportunities at Birchwood;
- The site can accommodate a high-quality residential development that integrates successfully with the existing built and natural environment, and includes 1.18ha of public open space;
- The development of the site will allow for the provision of good quality cycling and walking routes within the site to connect the site to the wider footway network and existing public right of way to the north-east, promoting connectivity with the existing community;
- The site is suitable, achievable and available for residential development in accordance with national planning policy;
- The site will deliver a range of housing tenures, types and sizes, including a mix of market and affordable housing to meet local needs; and
- There are no identified technical or environmental constraints that would prevent the delivery of housing on the site.

## Consultant Team

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### The development team consists of the following consultants:

- Richborough Estates Ltd - Client
- Avison Young - Planning Consultant
- nineteen47 - Illustrations
- Tyler Grange - Landscape Consultant
- RammSanderson Ecology Ltd - Ecology Consultant
- BWB Consulting - Drainage and Flood Risk Consultant
- Hub Transport Planning - Highways Consultant



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**AVISON  
YOUNG**

**nineteen47**  
CHARTERED TOWN PLANNERS  
& URBAN DESIGNERS

**TG** Tyler Grange

  
**RammSanderson**

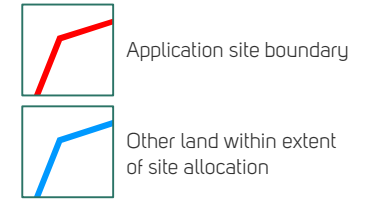
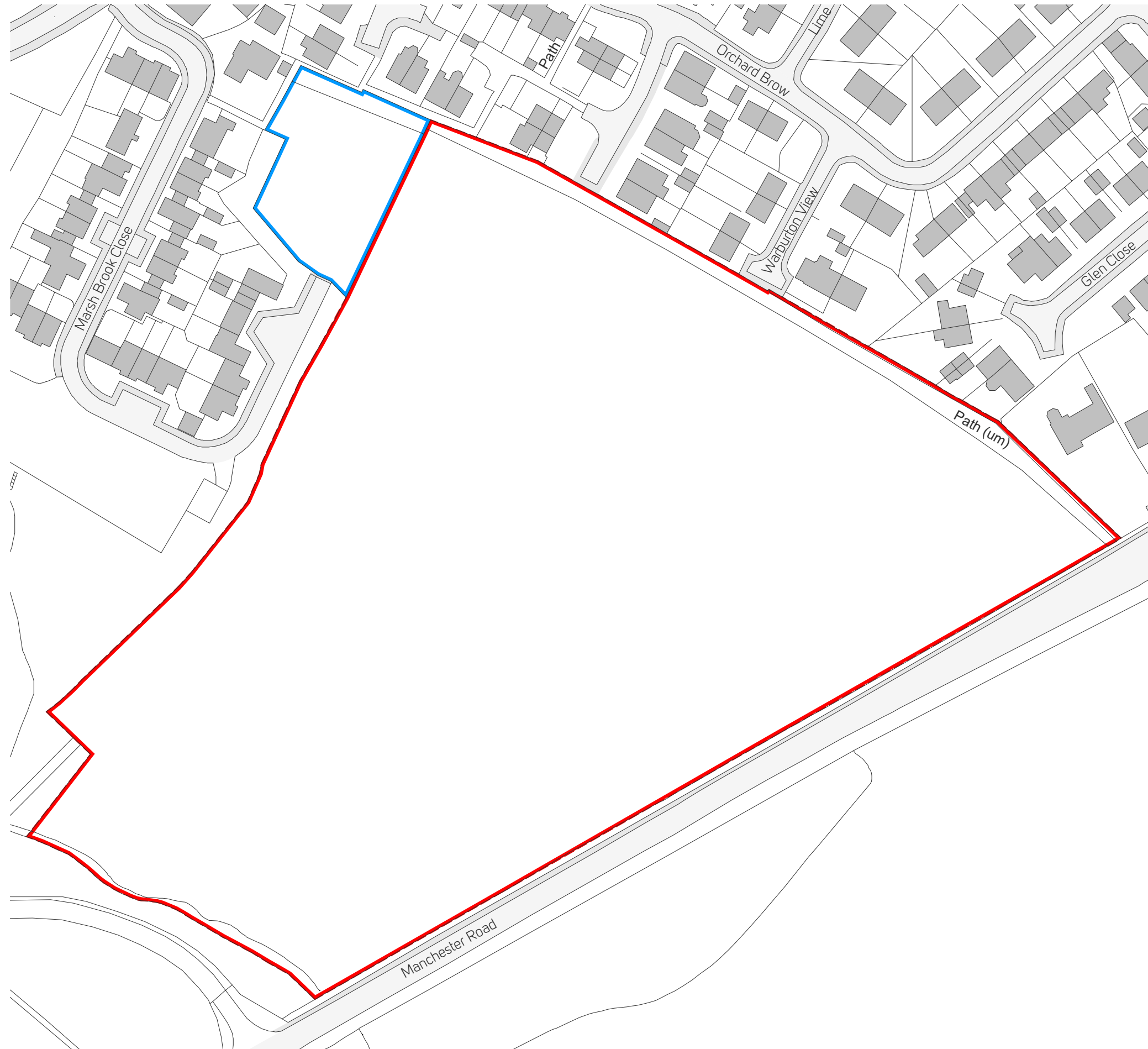
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# Appendix III Ownership Plan



Project  
Manchester Road, Rixton

Drawing Title  
Site Location Plan  
(Extent of Allocation)

Project Code	Drawing Nr	Rev	Drawing Scale
n1204_001	003	-	1:1,250 @ A3

## Contact Details

[Redacted contact information]

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### **Avison Young**

Norfolk House, 7 Norfolk Street, Manchester M2 1DW

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