

# Warrington Draft Local Plan 2021-38

## Updated Proposed Submission Version Local Plan Representations

November 2021

Hollins Strategic Land

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## 1 Introduction

- 1.1 These representations are made by Hollins Strategic Land (HSL) to the Updated Proposed Submission Version Local Plan (SVLP) consultation and follow previous submissions to the local plan process which promoted the Warrington Garden Suburb - WGS). HSL are advocating the reinstatement of the Warrington Garden Suburb and is specifically promoting land within this area known as Village C (Bridgewater Village) as an omission site.
- 1.2 In summary, HSL do not consider that the SVLP is legally compliant or sound, unless the modifications made in these representations are made. HSL can also confirm our intention to participate in the local plan examination.
- 1.3 HSL consider that the SVLP is unsound in a number of areas:
  - The overall housing requirement of 14,688 dwellings over the plan period (2021 to 2038) is too low. The circumstances in Warrington provide clear justification for a higher housing requirement than the standard method:
    - Most significantly, the housing requirement does not align with projected levels of economic growth nor the Government agenda to “level-up” the north of England.
    - The housing requirement should be increased to address affordable housing need given the historic shortfalls in provision.
  - The housing requirement should not be phased to reduce delivery in the early years of the plan period. This would compound significant housing needs at a time when they should be met as urgently as possible. Instead of phasing the requirement, the correct approach is to boost supply in the early years of the plan, and this can be done through the allocation of additional deliverable sites, such as Bridgewater Village.
  - Insufficient housing land has been identified in the short term, and overall, to meet the identified requirement (let alone a higher figure). There is a significant overreliance on the existing main urban area, existing inset settlements and SHLAA sites, despite such sites failing to deliver previously and the Council’s own evidence demonstrating that significant elements of the SHLAA supply are not viable.
  - The plan proposes no robust flexibility, which is insufficient to respond to change, for example non-delivery of allocations such as Fiddler’s Ferry or

SHLAA sites. In the absence of such flexibility, there is a real risk that housing need issues will be further exacerbated in Warrington.

- The plan proposes too much emphasis on delivering high housing densities:
  - 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 centre masterplan area and those sites adjacent to a district centre or in other locations that are well served by frequent bus or train services.
- This reliance on high density development conflicts with the borough wide housing target of 65% of market homes being 3-bed or larger as identified in the Local Housing Needs Assessment (LHNA 2021).
- There is no conceivable way that the identified affordable housing need (433dpa) which equates to 52% of the overall requirement could be met in full, yet the Council has failed to consider whether it would be appropriate to increase the housing target to make further provision for social housing needs.
- The plan fails to provide safeguarded land to meet longer term development needs and to provide permanence to the Green Belt.

#### 1.4 The following key changes are therefore necessary to make the SVLP sound:

- The plan period should be extended to cover at least a 20 year period 2021-2041 and ensure that longer term needs are properly considered over a 30-year period from adoption.
- The housing requirement needs to be increased substantially to at least 943dpa to properly align housing and economic growth and to meet the identified affordable need.
- The supply of housing sites should be boosted significantly and diversified through the allocation of additional deliverable sites.
- Additional Green Belt land release is required.
- Safeguarded land should be identified, to meet development needs post 2038.
- Warrington Garden Suburb must be reinstated in full.

#### 1.5 Finally, the SVLP fails to reflect Para 11 NPPF 2021 where Local Plans should reflect the presumption in favour of sustainable development by identifying and providing for objectively assessed needs and how the presumption will be applied locally.

- 1.6 The below sections set out our objections and concerns in relation to each relevant policy.

## 2 National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF2021) sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF2021, taken as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system.
- 2.2 Paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development. For plan-making this means that:
- a) *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
  - b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any other needs that cannot be met within neighbouring areas, unless:*
    - i. *the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
    - ii. *any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.*
- 2.3 Paragraph 35 provides the following in relation to soundness:
- 35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:*
- a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs [21]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
  - b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
  - c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

- d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

*Footnote 21. Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in Paragraph 61 of this Framework.*

2.4 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 national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

**National Planning Practice Guidance (NPPG)**

- 2.5 NPPG was launched in March 2014, replacing a number of practice guidance documents which were deleted when the PPG was published. Local plan making is addressed under Section 12 which has informed the preparation of these representations.

### 3 Plan Period

- 3.1 The proposed plan period set out in the SVLP is 2021-2038. Paragraph 20 of the Framework makes it clear that strategic policies are those which make provision for housing employment and other types of growth:

*“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

*a) housing (including affordable housing), employment, retail, leisure and other commercial development;*

*b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

*c) community facilities (such as health, education and cultural infrastructure); and*

*d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*

- 3.2 Paragraph 22 of the Framework states:

*“Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.*

*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area,*

*policies should be set within a vision that looks further ahead (at least 30 years),*

*to take into account the likely timescale for delivery.”*

- 3.3 Paragraph 22 therefore has two very clear requirements The first being that strategic policies must cover at least a 15-year plan period from adoption and the second being that in instances where large scale developments form part of the strategy, policy should be set with a vision that looks further ahead at least 30 years. The SVLP therefore fails to meet the second requirement.



3.4 The requirement that policies should be set within a vision that looks further ahead (at least 30 years) is applicable to the SVLP, given the need to define new Green Belt boundaries and the scale of the allocations proposed in the plan (many of which will not come forward for several years and will involve delivery beyond the end of the plan period). Indeed, that the SVLP sets out that there is an indicative housing supply between 2038 to 2050 of 2,515 dwellings from the SEWUE, Fiddlers Ferry and the Waterfront.

3.5 The Council is not seeking to argue that the transitional arrangements set out in Annex 1 (paragraph 221) of the Framework applies, but for the avoidance of doubt, paragraph 221 states:

*“For the purposes of the policy on larger-scale development in paragraph 22, this applies only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point this version is published (for Spatial Development Strategies this would refer to consultation under section 335(2) of the Greater London Authority Act 1999).”*

3.6 The SVLP does not seek to set out any vision looking beyond 2038, and there is no robust consideration of housing and employment needs and supply beyond the end of the plan period, other than stating that some sites will continue to deliver beyond the plan period. There is absolutely no vision or direction for how those needs may be met in the future without the need to review Green Belt boundaries. This is exemplified through the total absence of safeguarded land for housing and employment purposes. Paragraph 4.1.25 of the SVLP states that:

*“Given the major urban extensions being promoted as part of its spatial strategy, the Council has given consideration to an overall timescale of 30 years in accordance with the Government’s proposed amendment to the NPPF which requires Council’s to provide a longer term vision when promoting such forms of development. Having regard to the inherent uncertainties in looking this far into the future, the Council has used a set of notional assumptions covering the 12 years beyond the 18 year Plan Period. This is intended as a sense check, rather than a detailed assessment process.”*

3.7 The SVLP is a strategic plan for one most important economic centres in the region and the policies should be set within a vision that looks beyond 2038. Applying notional assumptions that simply set out that some of the allocations will deliver beyond the plan period is not appropriate. The Council set out that between 2038 to 2050 they expect 3,024 dwellings to be delivered on brownfield land, an average of 252 dwellings a year, which based on past completions, is very optimistic. Paragraph 4.1.30 of the SVLP states that:

*“The Council acknowledges that the availability of brownfield development sites is likely to decrease over time. Nevertheless, given likely advances in technology and development trends over the next 18 years, the Council considers it is likely there will still be additional brownfield development sites within the existing urban area that will come forward beyond the Plan Period but which cannot be accounted for at present. The Council has therefore identified the average level of brownfield development in the final 5 years of the Plan period and has projected this forward to account for potential brownfield capacity.”*

- 3.8 Again, by the Council’s own admission the supply of brownfield sites is likely to reduce over time. The approach to defining a vision that looks at least 30 years ahead set out in the SVLP is not appropriate and adds to the many issues of soundness identified in these representations, particularly in relation to lack of an adequate supply of housing sites and of safeguarded land. These points will be discussed in more detail throughout this report.

## 4 Duty to Cooperate

- 4.1 The Council, as a strategic policy-making authority, is required to cooperate with other bodies, when preparing policies which address strategic matters. The Council is bound by the statutory duty to cooperate and produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process.
- 4.2 The revised SVLP 2021 fails to do so in this regard on the grounds that no assessment or understanding has been presented which deals with the likely imbalances of jobs and homes within the borough as a result of the Council's strategic economic growth plans and delivery of housing only to meet demographic need. The SVLP 2021 is therefore not legally compliant.
- 4.3 The Council has chosen to rebase its plan period to meet minimum time periods, lower its housing requirement to meet minimum demographic need but yet is maintaining a growth agenda that far exceeds its economic job forecasts instead opting for economic growth based on historic take up rates which could see the creation of over 40,000 jobs. This is a significant gap when compared to the job forecast methodology used in the EDNA 2021 and indeed the HNA 2021 which assumes around 15,000 jobs will be supported by the demographic need of 816dpa. For the avoidance of doubt, we commend and indeed support the Council's economic plan to deliver more jobs. However, no assessment has been made on the likely housing numbers that would be generated from its economic growth plans which are not only local matters but strategic by nature.
- 4.4 The NPPF2021 is clear (Para 25) that the Council should collaborate to identify the relevant strategic matters which they need to address in their plans. Whilst the Council has focussed on collaborating with St Helens on employment land designations there is no apparent recent assessment of the housing need that would be generated by its economic growth plans and how these homes will be delivered, if not within the borough boundary. The result of which would surely generate an unmet housing need of over 4,000 homes as indicated by the evidence contained within the EDNA (2021). It would be much worse if the economic strategy actually meets full job creation meaning a shortfall of around 9,000 homes over the period (this latter calculation is based on the previous OAN calculations prepared by the Council in 2017 which measured the number of homes needed to meet economic objectives – see evidence base).
- 4.5 The distribution of unmet needs in the area must therefore be agreed through the plan-making process, or at the very least the process for agreeing the distribution of need (including unmet need) across the area through a statement of common ground between the adjoining authorities.

**Object – Not Legally Compliant**

**Solution - Uplift housing numbers /Reinstate Warrington Garden Suburb Allocation**

## 5 Vision – Warrington 3028 and beyond

- 5.1 The strategic planning policies, as drafted, do not reflect the Council’s vision for Warrington 2038 and beyond. The proposed strategy is at complete odds with Warrington’s stated long term growth objectives being;
- *“Warrington will be positively planned to ensure that new homes, jobs and businesses are supported by major improvements to infrastructure;”*
  - *“Warrington will be one of the most important economic hubs in the UK;”*
  - *“Warrington will have a highly skilled workforce that will support a wide range of economic activities, including engineering, hi-tech manufacturing, green technologies, business services, logistics and research and development.”*
- 5.2 Whilst we support the principles behind the vision for Warrington 2038 and beyond, we are concerned that the proposed strategic policies are not positively prepared (contrary to NPPF 2021 and NPPG as updated) and will not translate the vision or meet the objectives of the Local Plan.
- 5.3 The evidence base on housing need is fundamentally flawed. It suppresses housing growth to meet only demographic needs with absolutely no uplift to reflect affordability or market signals. The Housing Needs Assessment (HNA2021) concludes that by 2038, Warrington will have a significant aging population above 65 (Table 40 HNA2021) and projects an estimated increase in the economically active population as those aged between 60-69 and older who are still working.
- 5.4 More concerning is that the projected changes to economic activity rates in males between the ages of 16-59 is set to decline by 2038. We are therefore somewhat bemused on how exactly a highly skilled wide-ranging workforce will be delivered unless of course the vision relies on android technology as a future labour source together with utilising an older labour demographic over 65 and a workforce who live outside the borough. We therefore raise significant concerns with the Council’s approach to housing, particularly in light of its commendable economic strategy which encourages growth in jobs.
- 5.5 The Economic Development Needs Assessment (EDNA2021) recommends the Council pursue an ambitious economic growth strategy based on previous historic take-up trends. Indeed, the Council’s proposed economic policy reflect the benefits of growth

which could support an increase in job creation in excess of 40,000 over the plan period.

- 5.6 The vision is therefore not effective as the Council's proposed planning policies fail to reflect the evidence base and, as such, will create a mismatch between planned housing numbers and jobs. To plan for 816dpa does not provide a balance when compared with the planned employment growth strategy which is likely to yield over 40,000 jobs.
- 5.7 In terms of transport, the Vision fails to refer to specific LTP 4 (2019) objectives, particularly in relation to Mass Transit and Cycle objectives, which aim to deliver transformation changes to Warrington. We do not see how the planning strategy or indeed the strategic policies will deliver these objectives. The distribution of new homes is dispersed and likely to exacerbate greater travel patterns. The removal of the Warrington Garden Suburb (WGS) has negated any hope of delivering transformational changes to Warrington in terms of transport such as Mass Transit and Cycle packages in which the allocation of the WGS could form the catalyst to change by harnessing and directing investment to a focussed area.
- 5.8 In terms of climate change, the move to carbon neutral is supported but the vision does not reflect the current climate emergency in Warrington in which its Green Energy Strategy aims for carbon neutrality by 2030. To do so, would have been helped by the planned approach of the WGS. The proposed spatial strategy now proposes less homes on more sensitive sites but encourages more job growth and thus creating far more travel movements to and from the borough, leading to other environmental harms associated with creating less self-containment.
- 5.9 The strategic policies must be amended to ensure a proper balance between jobs and homes is delivered to 2038 and transformational change is delivered in the Borough through the full reinstatement of the WGS.

## 6 Policies Relating to Objective W1: Housing

### Planning for Warrington's New Homes

- 6.1 Para 4.1.1. states;
- 'The 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 of the Borough's existing and future communities'*
- 6.2 We agree that the Local Plan must do this. However, the proposed strategic policies on housing do not translate to ensure sufficient homes are delivered to support its economic growth plans. The evidence illustrates that housing will be suppressed in future years as it is forecast on basic demographic need alone. The evidence on need fails to address acute affordable housing shortfalls, market signals and more fundamentally it completely ignores the economic growth strategy proposed.
- 6.3 The Local Plan is therefore not sound.

### Policy DEV 1 Housing Delivery

- 6.4 The proposed housing 'requirement' of 816dpa is directly derived from the Government's Standard Method calculation. Policy guidance is clear that this is the starting point and is not a housing requirement per-se. This is a baseline demographic housing need figure for the borough which includes a slight adjustment for affordability (capped at 40%) but it has no regard to affordability (in real terms), market signals or indeed economic growth objectives. The Council has therefore failed to provide an objectively assessed need for housing.
- 6.5 Since the start of the plan process, the Council's housing 'target' has been on a sliding scale, yet the Council continues to maintain high economic objectives.
- 6.6 In 2017/18, the Council opted for a pro-growth strategy and concluded on a housing figure of 1,113 dpa to meet economic objectives/aspirations. It was accepted at the time that this figure is appropriate to ensure the balance between jobs and homes is maintained. Indeed, the approach was supported by the evidence base. The 1,113 dpa figure was based on an uplift from the established Objectively Assessed Need of 955 dpa. Given the pro-growth plans, the Council aligned to support a 20 year plan period from 2017-2037 and plan for the necessary homes and infrastructure that would support its economic growth agenda.

- 6.7 In 2019, soon after the introduction of the Government’s new standard methodology approach to calculating housing need, the Council opted to review its housing and economic strategy, primarily driven by the fact that the newly introduced method for calculating housing need illustrated a lower minimum need of 909 dpa (much lower than the previous baseline figure of 955 dpa). At the time, the Council again agreed to adopt a pro-growth planning strategy which focused on maintaining housing to a level it thought could align with its increased employment land target of 362 ha. This intent signaled the Council’s support for economic prosperity, and with that, the Council agreed to plan for homes above minimum demographic need as calculated by SM1 as this would best align with the economic strategy and more fundamentally to deliver critical infrastructure and wider community benefits. The Council agreed to 945dpa (this was actually based on a 4% increase above SM1 figure of 909dpa) and plan over a 20 year period from 2017 – 2038, committing itself to large scale planned communities such as the Warrington Garden Suburb which sought to deliver wider community benefits such as mass transit infrastructure in line with Local Transport Plan 4 objectives which would encourage modal change and bring transformational change to the borough as well as a new Country Park.
- 6.8 With a further change to standard methodology in 2020, the Council again opted to delay the submission of its 2019 Submission Version Local Plan. The SM2 calculation produced an even lower housing need figure (816dpa) compared to SM1 (909dpa) and the previous OAN (1113dpa), equating to a 14% reduction on 2019 housing needs figures and 26% on previous OAN figures. In fact, the SM2 methodology produced (in general) a lower housing figure across the majority of northwest LPAs. However, unlike the 2019 Submission Version Local Plan, the Council has now opted to shorten the plan period from 20 years to 18 years and in doing so it is further reducing the housing numbers it needs to plan for. The Council consider it is inappropriate to uplift the SM2 housing need figure despite continuing to propose a significant employment growth strategy which sees the Plan making allocations for 316ha of employment land and a continuing rise on affordable housing backlog (from 377dpa in 2019 to 433dpa in 2021 – data source from HNA 2019 and HNA 2021).

- 6.9 The proposed approach to proceed with a high economic growth agenda is welcomed but planning for the baseline housing growth to meet minimum demographic need is a serious error of planning judgement on the Council's behalf. Not only does it disregard national planning policy objectives to boost the supply of new homes but to continue such a planning strategy will no doubt lead to imbalances between large scale significant employment growth and new homes resulting in exacerbated house prices, unsustainable travel patterns and large scale in-commuting. Planning for the absolute minimum based on demographic housing need alone with no consideration given to market signals, affordability let alone the increase in job provision over and beyond baseline increase associated with the job forecast set out in the EDNA (2021) is flawed and unsound.

### Object Policy DEV 1 Housing Delivery

The policy is not effective, not justified and not consistent with national policy.

#### Solution

The housing requirement be uplifted to at least 943dpa to meet affordable needs, address market signals and align with economic growth objectives.

Reinstate Warrington Garden Suburb in full in accordance with existing evidence base.

### Setting the Housing Target - should be setting the minimum housing provision

- 6.10 Firstly, it should be noted that the housing numbers must not be treated as a target. The use of the word '*target*' within the plan is misleading and will no doubt encourage a ceiling approach to meeting housing needs throughout the plan period. The policy refers to a minimum and therefore the word '*target*' must be removed altogether. Secondly, the proposed housing requirement is not reflective of boosting supply, will not meet affordable shortfalls and will significantly create imbalances when compared to the level of jobs likely to be created through the economic policies of the plan.
- 6.11 NPPG is clear that the standard method is not a housing requirement. Notwithstanding, the Council consider the SM2 calculation '*represents the minimum number of homes that Warrington is expected to plan for, in a way which addresses*



*projected household growth and historic under-supply*' (Para 4.1.6 of the PSLP2021-2038).

- 6.12 More notable is the Council's statement that it has updated its Economic Development Needs Assessment (ENDA 2021) to ensure that the Plan's housing and employment requirements are balanced. (Para 4.1.7). This is simply not the case.
- 6.13 The Housing Need Assessment (HNA 2021) models increased working age population resulting from a housing requirement of 816dpa up to 2038. Increases in working age population is considered to be sufficient to support the number of additional jobs that are likely to be created in Warrington taking account of the latest jobs forecast for the borough. However, this is misleading. The EDNA 2021 uses two forecasts; jobs growth and historic trend-based scenarios. The latter is the preferred / recommended approach as it is more realistic. The Council confirms this by extrapolating data from 2002 – 2020 on actual employment take-up rates over that period and measured it against job forecasts at the time. It concluded that job forecasts significantly underestimate growth. The Council has therefore justified its approach of using take-up rates as the basis to inform economic strategic policies contained within the Plan. The HNA (2021) on the other hand does not reflect jobs generated by take-up trends and instead uses the local job forecast methodology to inform housing need, which, as confirmed in the evidence base, is an unrealistic approach for Warrington.
- 6.14 In this context, the EDNA 2021 confirms an approach based on historic take up rates as opposed to job forecasts for the simple reason that the latter significantly underestimates growth.
- 6.15 In addition to the dismissal of economic forecasts, the HNA (2021) does not explore the option of meeting full affordable needs. There is a significant shortfall in Warrington of 422 dpa to meet affordable need. The affordable housing situation is worsening in Warrington, when 377dpa were identified as the affordable housing need. There is no uplift. Previous HNA (2019) recommend an uplift of 5% to address affordability issues within the borough.
- 6.16 To make the Plan sound in terms of the housing requirement, the housing number must be uplifted to better align with economic growth policies in order to allow for a balanced approach in delivering homes and jobs in the area. The existing evidence supports an uplift of at least 943dpa (see below table) and the reinstatement of the Warrington Garden Suburb allocation in full.

### Object – Setting the Housing Requirement

The Council's approach is unsound on the grounds of not being;

- Positively prepared
- Not Justified
- Not Effective
- Not Consistent with national policy

The evidence on housing need (HNA2021) is fundamentally flawed as it does not address economic growth provisions as set out in the EDNA 2021 report. Instead, the HNA looks at minimum job provisions and runs contrary to conclusions drawn in the 2019 evidence base, implying that SM2 housing need figures can meet the boroughs future jobs provision even though the SM2 figure is reduced by over 14%.

The table below is based on the current evidence prepared by the Council. It was recommended in the HNA (2019) that a 5% uplift be applied to standard method calculation in order to meet affordable needs. At that time, the affordable housing shortfall was 377dpa. It is now 425dpa (HNA 2021) and thus further worsening, yet the Council fail to justify properly why no uplift is applied on the updated housing requirement calculation. An uplift to meet affordable needs is therefore fully reasoned and justified by the evidence base and moreover is compliant with national policy.

We advocate a further uplift to support the Council's welcomed economic growth strategy. Based on previous OAN calculations in 2017, the Council accepted a housing figure of 1,113dpa to support its economic objectives. This figure was based on an uplift from minimum demographic need. Whilst the process for calculating housing requirements has now moved on to standard methodology, the principles of defining an objectively assessed need (OAN) remain. Therefore, our approach is supported by the evidence which justifies that a further uplift of 10% to support economic objectives is reasonable and fully justified in accordance with national policy.

### Requested Change for Soundness

Standard Methodology Calculation (SM2)	Affordable Housing Uplift	Economic Growth Uplift to align with Policy DEV4 job growth objectives	Total Minimum Housing Requirement	Total Housing in 20 year Plan Period 2021 - 2041	Flexibility at 10%
816dpa	+5%	+10%	943dpa	18,860	20,746

The housing figure for Warrington should be at least 943dpa, which is reflective of the 945dpa planned for as part of the SVLP (2019). This reflects circa a 15% uplift on demographic need. This matter was discussed at length as part of the Waverley Examination, where the extent of the Council's affordability pressures was tested and it was concluded that an uplift in the region of 25% was necessary.

## Establishing Land Requirements

- 6.17 In identifying land to meet the housing requirement, the Council has focused on delivering new homes within the existing main urban area of Warrington, existing settlements and other sites identified in the Council's SHLAA which together have an identified capacity for a minimum of 11,785 new homes. We support the urban focus approach. However, the Council acknowledge through the evidence base that supply on brownfield sites within the urban area will not meet its future housing needs and as such Green Belt release is needed. We concur.
- 6.18 The Council has not published an updated SHLAA 2021 document as an evidence base document to support the submission plan. We have however reviewed the 2020 SHLAA Appendix 1 which defines 'suitable sites' and make the following observations regarding deliverability on a number of identified 'deliverable' brownfield sites. Our assessment highlights (*as a way of providing an example of the vulnerabilities in some of Warrington's urban sites*) that at least 7 sites, which are deemed 'deliverable' by the Council, are in fact not and would not meet the tests on deliverability required by NPPF 2021.
- 6.19 There is therefore no up to date evidence to support the delivery of SHLAA sites in the first 5 years of the plan and no indication of what sites will likely deliver in years 6-10. Instead, the Council make generic assumptions based on max capacity of urban sites delivering through the plan period but as we have highlighted this approach cannot be relied upon without further evidence demonstrating deliverability.
- 6.20 Using the Council's approach to establishing its land requirements our review indicates that at least 2,000 homes must be discounted from the capacity assumptions simply based on the known constraints to delivery as illustrated in HSL Table 1 (next page). On this basis, the supply from urban capacity sites must be discounted by 2,000 which would yield circa 9,785 homes.

SHLAA Site	Capacity	HSL Assessment Review
SHLAA Ref 2471 – Pinners Brow Retail Park	193	Existing multi-let retail park in high profile location likely to remain in retail use.
SHLAA Ref 1543 – Knutsford Road, Latchford	93	Site not available and cannot be assumed likely to become available. Overhead electricity cables will require stand-off no build zone which will severely limit capacity below that suggested. Arboricultural/ecological constraints due to heavy vegetation and trees over majority of site
SHLAA Ref 1642 – Bewsey Old Hall	55	Consented 2007/2008 and to date only listed hall converted into 7 apartments.
SHLAA Ref 2482 – Wharf Industrial Estate	128	Existing multi-let industrial estate deemed popular with local businesses in central location.
SHLAA Ref 3567 – Dallam Lane (West Side)	212	Significant refurbished warehousing on site considered viable in existing use as “last mile” distribution hub.
SHLAA Ref 1541 – Arpley Meadows	605	Developability and viability uncertain due to very poor ground conditions (dredging grounds) and proximity to former active landfill. Serious access constraints due to river and main line railway. Flood risk. More suited to hard cover employment development.
SHLAA Ref 1633 – Arpley Meadows.	730	Developability and viability uncertain due to very poor ground conditions (dredging grounds) and proximity to former active landfill. Flood risk. More suited to hard cover employment development.
Total from 7 sites	2,016	Non-Deliverable / Non Developable.

**HSL Table 1 – SHLAA Sites: Non Deliverable Examples**

6.21 Further scrutiny of the SHLAA brownfield sites will no doubt highlight greater shortfalls in the Council’s land capacity evidence base.

	WBC Demographic Housing Need	HSL Evidence Review Conclusions	Base
Annual Requirement	816	816	943
2021 to 2038 (18 years)	14,688	14,688	16,974
Flexibility @ 10%	1,469	1,469	1,697
Total Requirement	16,157	16,157	18,671
Urban Capacity	11,785	9,785	9,785
Green Belt Requirement	4,372	6,372	8,886

**HSL Table 2: Land Requirement (Residual Need) – 18 year period.**

- 6.22 The Council's assumptions on delivery from urban capacity sites is overly optimistic. A more realistic figure of residual land requirements would be to deliver circa 6,300 and 9,000 homes (HSL Table 2). The residual land requirement is actually greater if a 20 year plan period is progressed, which HSL is advocating.
- 6.23 The Council's own evidence base is clear that urban land cannot deliver the homes that it needs. Additionally, the Council's evidence base concludes that the release of Green Belt land is required. However, the quantum of land needed is suppressed as the Council has chosen to suppress its housing requirement and indeed over egg its brownfield capacity.
- 6.24 The Council conclude that at least 4,372 homes will need to be delivered through Green Belt release. However, based on the Council's evidence that figure is at least 6,372 new homes. This equates to an additional need to release land for at least a further 2,000 new homes above the current proposed Local Plan figures.
- 6.25 Given that the more appropriate housing requirement figure for Warrington is at least 943dpa, this would generate a requirement to release land from the Green Belt to accommodate circa 8,886 new homes over the plan period (3<sup>rd</sup> column on Table 2).
- 6.26 In summary, the Council has failed to identify enough land to meets its housing requirement.

### Object – Establishing Land Requirements

No robust deliverability test of urban capacity sites in accordance with NPPF2021

An initial review of urban capacity sites illustrates that capacity is reduced to 9,785.

As a result, Green Belt Requirement is at least 6,300 (or at least 9,000 based on economic growth).

### Solution

The evidence supports green belt release at Warrington to deliver LTP4 objectives and increase self-containment at Warrington and as such the focus of Green Belt release should be at Warrington.

Reinstate Warring Garden Suburb to deliver at least 5,000 new homes. This amendment provides flexibility to deliver homes and creates a framework to plan for critical infrastructure required to deliver LTP4 objectives as well as wider public benefits such as a new Country Park.

## Housing Distribution

- 6.27 The proposed housing distribution is flawed. Whilst we support the focus to distribute housing to the urban area, we also concur with the Council's position that green belt land is required and indeed justified in principle.
- 6.28 It is also clear from the evidence base, that the Council has applied overly optimistic assumptions on its brownfield supply and therefore the need for Green Belt land is actually greater.
- 6.29 The distribution strategy is not based on any evidence of local housing need relating to the outlying settlements. It is merely justified by capacity resulting from a 'call for sites' process.
- 6.30 We support the approach to focus Green Belt release around the urban fringes of Warrington being the most sustainable settlement but object to releases at the outlying settlements without having appropriate evidence in place to understand local housing needs in these wider locations.
- 6.31 We object to the distribution of new housing to Fiddlers Ferry on the grounds that it would lead to coalescence between Widnes and Warrington on a green field land parcel designated as Green Belt. The Councils evidence concurs. Whilst a large part of

the Fiddlers Ferry site is previously used land, any future development proposal must be limited to that part. The exceptional circumstances case for releasing non developed parts of the site for housing to enable regeneration is not clearly justified and no robust evidence made available to support the site for housing other than its brownfield elements, which is currently proposed for employment uses as an extension to the Widnes Waterfront employment area. Thus, reflecting the sites geographical position to Widnes and being detached completely from Warrington.

- 6.32 We object to the inclusion of Thelwall Heys allocation on the grounds that it does not provide any credible or robust evidence on its exceptional circumstances case to justify release from the Green Belt. It does not contribute to infrastructure needs or provide any wider benefits and instead its inclusion compromises the potential to secure and deliver more tangible community benefits such as a Country Park and critical transport infrastructure (LTP4 2019) objectives associated with the Garden Suburb option.

### Object – Housing Distribution

No evidence is presented to indicate how the distribution figures for the outlying settlements have been informed. We understand these settlements are or will be designated neighbourhood areas or at least have the potential under national policies. There is no local housing need evidence relating to individual settlements, so it is unclear how the proposed numbers to each settlement are justified. National policy indicates that distribution to such settlements through strategic policies should be informed by local housing needs assessment (Para 61 / 66 NPPF 2021). The proposed policies for the outlying settlements are strategic and therefore should be justified by further evidence such as local housing needs data to ensure homes are delivered where needed (NPPF 2021 Para 60).

The distribution of housing to outlying settlements is therefore considered unsound on the grounds that the approach is not justified given the lack of evidence on local housing needs at such settlements and not consistent with national policy 'Delivering a sufficient supply of homes' in addition lack of evidence to support the proposed Green Belt release land parcels at outlying settlement allocations.

### Requested Amendments

- Delete requirement of 801 new homes to Outlying Settlements.
- Propose new strategic policy for Neighbourhood Plan areas which supports new development to meet local housing need in a planned manner through urban sites in addition to green belt releases if exceptional circumstances exist and where supported by up to date local housing needs evidence.
- Delete Fiddlers Ferry allocation for housing.
- Delete Thelwall Heys allocation for housing.

### Solution

- Redistribute 801 dwellings from Outlying Settlements to Warrington Garden Suburb location
- Redistribute Fiddlers Ferry housing numbers 1,310 (1,760) to Warrington Garden Suburb
- Redistribute Thelwall Heys housing numbers 310 to Warrington Garden Suburb



## Stepped Housing Requirement

- 6.33 The Council propose to step the housing requirement in the following way;
- 2021 to 25: 678 dpa (in first 5 years)
  - 2026 to 38: 870 dpa
- 6.34 The proposed stepped approach to housing delivery is unfounded and no robust evidence is presented to support this approach. The Council has failed to meet it's housing delivery obligations since 2012 and yet continue to progress a strategy based on underperformance. The latest land supply position is 3.6 years and the Council acknowledge it fails the Housing Delivery Test (HDT).
- 6.35 The proposed housing trajectory fails even on the Council's own assumptions contained within the proposed trajectory, equating to a land supply of circa 4 years at the start of the proposed Local Plan period and that is prior to any scrutiny of the claimed SHLAA sites.
- 6.36 National policy requires the Council to identify and update annually a supply of specific deliverable housing sites sufficient to provide a minimum of five years' worth of housing against their housing requirement

### Object – Stepped Housing Requirement

The proposed stepped housing requirement is unsound.

It is not justified and not consistent with national policy to support the Governments objective to significantly boost the supply of homes (Para 60).

### Solution

Reinstate Warrington Garden Suburb in full. This would allow for more outlets to be opened across the garden suburb area and deliver early in the trajectory.

Expected delivery rates across the Garden Suburb based on 6 building outlets operating is circa 57dpa x 6 outlets = 342dpa. With the full WGS in operation there would be as many as 5 housebuilders operating within allocation. As a national land promoter having an established Northwest regional house builder, we are confident the demand for homes in Warrington remains strong, in particular within the WGS location close to jobs.

## Dev 2 Meeting Warrington’s Housing Needs

- 6.37 It is accepted that brownfield opportunities may reduce affordable housing delivery. However, the proposed housing requirement does not translate into meeting Warrington’s housing needs and as such affordable housing delivery will be further prejudiced over the plan period. The policy is therefore unsound as it is not effective.

### Object - Dev 2 Meeting Warrington’s Housing Needs

The policy is not effective, not justified and not consistent with national policy.

### Solution

The housing requirement be uplifted to at least 943dpa to meet affordable needs, address market signals and align with economic growth objectives.

Reinstate Warrington Garden Suburb in full in accordance with existing evidence base.

## Policy DEV4 – Economic Growth and Development

- 6.38 The policy provides for an additional 316.26ha of employment land to support both local and wider strategic employment need.
- 6.39 We support the Council’s economic policies, and it is good to see the Council commit to ambitious plans as supported /encouraged by the Warrington Means Business Regeneration Program, the LEP and the SEP (Para 4.2.7 of the PSVLP2021). In terms of housing, we are surprised however to note the evidence base within the HNA (2021) now appears to downplay Warrington’s ability to grow stating that uncertainty over Brexit and post pandemic matters has altered the Council’s belief of its future growth plans but on the other hand the EDNA 2021 continues to recommend an ambitious growth strategy which is reflected in the DEV4 policy.

- 6.40 The Council’s approach in this regard is flawed in terms of supporting the low housing numbers to meet demographic need within the HNA 2021 (which downplays economic growth contrary to the ENDA2021 recommendations) and on the other hand supports economic growth and job creation through its policy DEV4.
- 6.41 For the avoidance of doubt, we support the approach adopted in the EDNA2021 to forecast future employment land using historic land take up rates rather than labour demand. The HNA 2021 on the other hand has not assessed housing need based on historic take up rates and instead uses the unreliable labour demand forecast.
- 6.42 It is also worth noting that Warrington has indeed had an excellent take up rate of employment land but the population change is very unlikely to correlate with the take up rate given the fact that housing delivery has been suppressed in Warrington since 2015. As a result of Warrington’s low housing delivery rate, the stats are somewhat skewed to show there is no correlation between employment take up and housing growth.

#### **Support - Policy DEV4 – Economic Growth and Development**

We support the policy to increase jobs which should help encourage self containment and infrastructure provision

Reinstate WGS to support growth plans and self containment as well as deliver planned infrastructure.

## 7 Policies Relating to Objective W2: Warrington Green Belt

- 7.1 We support the Council's objective to ensure Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.
- 7.2 The Council accept that it cannot meet its development needs without releasing Green Belt land for development. We concur. However, we disagree with the Council's identified areas of land to be removed from the Green Belt and the new defined boundaries on the grounds that the approach is unsound.
- 7.3 The proposed housing policies and related distribution strategy are at odds with the Council's claim at Para 5.1.10 of the SVLP 2021 that '*Exceptional Circumstances*' are justified through the spatial strategy of the plan via '*the creation of new sustainable communities which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites*'. The proposed strategy creates greater dispersal of housing sites across the borough leading to increased reliance on ad-hoc sites with no certainty of delivering and, as a result of progressing a plan with lower housing numbers, it's a plan that provides less infrastructure, less community benefits and with economic policies likely to create significant job growth, there will be an inevitable unbalance between homes and new jobs. Para 141 of the NPPF is clear that before concluding exceptional circumstances exist to justify Green Belt boundaries, the Council should demonstrate that it has examined all other reasonable alternatives for meeting its **identified need**. The Council has failed in this regard.
- 7.4 Para 142 NPPF places a need for the Council to promote sustainable patterns of development when reviewing Green Belt boundaries. We question the Council's justification to progress significant boundary changes to a number of outlying settlements particular without any evidence on local housing need and the likely resulting factor of creating unsustainable travel patterns across the borough and the wider area.
- 7.5 Whilst the Council has failed to identify a proper housing requirement figure, it has also failed to properly consider the consequences for sustainable development of channelling development towards the outlying settlements.
- 7.6 In terms of defining Green Belt boundaries, the Council fails to reflect Para 143 criteria (a) to (f) of national policy;
- the approach fails to ensure consistency with the development plan strategy for meeting identified requirements for sustainable development;
  - it includes land which should be kept permanently open;
  - does not identify areas of safeguarded land to meet longer term development needs stretching beyond the plan period;
  - cannot demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period;

- does not define boundaries clearly using physical features that are readily recognisable and likely to be permanent.

7.7 The Councils approach to Green Belt boundary changes is therefore fundamentally unsound in that it is not effective, not justified and not consistent with national policy.

### Land removed from the Green Belt:

#### Strategic Level Exceptional Circumstances

7.8 Based on the Council's evidence there is a need to deliver at least 6,300 new homes on Green Belt land. (see HSL advocacy on housing needs and residual land requirement). Additional land is therefore required to support the Council's spatial strategy.

7.9 We object to the following sites;

#### Fiddlers Ferry

7.10 The Council's evidence accepts the vulnerabilities of the Fiddlers Ferry site in terms of potential coalescence between Widnes and Warrington (WBC Green Belt Selection: Implications of Green Belt Release 26<sup>th</sup> August 2021). The evidence acknowledges the site is more closely linked with Widnes than Warrington. In terms of Purpose 1 of Green Belt objectives, the assessment concludes *'the site is connected to Widnes and is not connected to the large built up area of Warrington'*. It further acknowledges the site would reduce the separation between the Warrington urban area and Widnes.

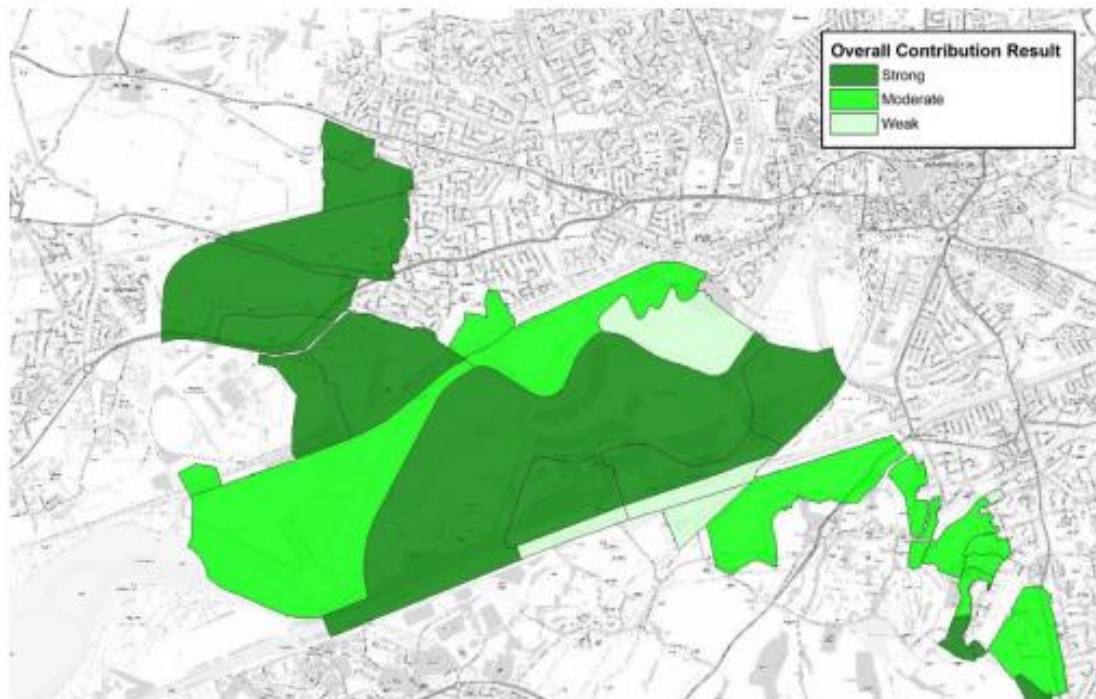
7.11 Development would reduce the separation between the Warrington urban area and Widnes (as shown in the extract from the Council's Green Belt evidence papers).

7.12 The southern parcel is deemed to *'form an essential gap between the Warrington urban area, Runcorn and Widnes'* whereby development of the parcel *'would reduce the perceived gap between the towns and significantly reduce the actual gap resulting in the near merging of these towns'*. The assessment concludes that the southern parcel makes *'a strong contribution to preventing towns from merging'*. Other than the brownfield part of the site, there are no exceptional circumstances to justify additional land releases from the Green Belt at Fiddlers Ferry site.

7.13 The eastern parcel forms an essential gap between the Warrington urban area and Widnes whereby development of the parcel would reduce the actual and perceived gap between the towns. It has been judged to make a strong overall contribution as it supports a strong degree of openness and there are non-durable boundaries between the parcel, the settlement and the countryside therefore the parcel has a strong role in preventing encroachment into the open countryside. The parcel therefore makes a

strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt.

**Figure 3. Extract of the chloropleth map showing the overall assessments**



- 7.14 The site would require a new Green Belt boundary to be established on its eastern edge which would need strengthening to ensure permanence in the long term. A new boundary would therefore need to be established in this location to provide a recognisable and permanent Green Belt boundary.

### **Thelwall Heys**

- 7.15 In terms of heritage, the site provides important viewpoint of the Parish Church. No assessment is made on heritage impact arising from the proposed allocation and as such the allocation is not justified given the harms to the heritage environment which is currently protected by Green Belt designation.

### **7.16 SEWUE**

The eastern boundary consists of sections of field boundaries and the south eastern boundary consists of a field boundary. These would need to be strengthened to create a new recognisable and permanent Green Belt boundary. The eastern boundary of the SEWUE is weak and not readily recognisable contrary to Para 143 (f) NPPF. In line with the evidence base, the eastern boundary must be amended to include the A50 Knutsford Road being a strong physical feature that is readily recognisable and is likely to be permanent.

### Local Level Exceptional Circumstances

- 7.17 We object to the following sites;
- 7.18 Land at Croft – Object: The allocation for green belt release is not justified/ not consistent with national policy. There is no assessment of local housing need at Croft to justify green belt release to meet local housing need. Suitable sites and green belt release to meet local housing should be made through non-strategic policies such as Neighbourhood Plans.
- 7.19 Land at Culcheth – Object: The allocation for green belt release is not justified/ not consistent with national policy. There is no assessment of local housing need at Croft to justify green belt release to meet local housing need. Suitable sites and green belt release to meet local housing should be made through non-strategic policies such as Neighbourhood Plans.
- 7.20 Land at Hollins Green – Object: The allocation for green belt release is not justified/ not consistent with national policy. There is no assessment of local housing need at Croft to justify green belt release to meet local housing need. Suitable sites and green belt release to meet local housing should be made through non-strategic policies such as Neighbourhood Plans.
- 7.21 Land at Lymm – Object: The allocation for green belt release is not justified/ not consistent with national policy. There is no assessment of local housing need at Croft to justify green belt release to meet local housing need. Suitable sites and green belt release to meet local housing should be made through non-strategic policies such as Neighbourhood Plans.
- 7.22 Land at Winwick – Object: The allocation for green belt release is not justified/ not consistent with national policy. There is no assessment of local housing need at Croft to justify green belt release to meet local housing need. Suitable sites and green belt release to meet local housing should be made through non-strategic policies such as Neighbourhood Plans.



## Object - Policy GB1 – Green Belt

### Local Level Exceptional Circumstances

- No exceptional circumstance provided to justify local level site allocations at Outlying Settlements.

### Strategic Level Exceptional Circumstances

Fiddlers Ferry Site:

- Not justified / Not compliant with national policy.
- Amend policy to focus on brownfield only part of the site for employment only.

Thelwall Heys Site:

- Not justified / Not compliant with national policy.
- Delete.

SEWUE Site:

- Not effective
- Amend eastern boundary to include the A50 Knutsford Road being a strong physical feature that is readily recognisable and is likely to be permanent.

### Solution

- Focus Green Belt release at South East Warrington
- Reinstate WGS to support growth plans and self-containment as well as deliver planned infrastructure.



## 8 Policies Relating to Objective W4: Transport

- 8.1 The proposed level of housing and employment growth across the borough over the plan period means there is a critical need to address dependency on the private car and increase the use of public transport, cycling and walking, as alternative ways to travel as well as the need for significant infrastructure. We agree.
- 8.2 However, the spatial strategy to deliver new homes will exacerbate the dependency on the private car and will further impede the delivery of critical transport infrastructure to encourage shifts in travel behaviors. The Local Plan should be at the heart of driving change and reflecting LTP4 (2019) objectives must be given absolute priority in order to deliver transformational change in the borough through planned infrastructure provision.
- 8.3 We welcome the Council's belief that *'there is an opportunity to minimize the need to travel by providing local facilities and services alongside new development'*. Again, this is not translated in its proposed strategic policies on housing.
- 8.4 The Local Plan must provide the framework to encourage sustainable patterns of movement. We agree with the Council that the Local Plan should identify shortfalls in infrastructure provision as a result of growth and, with that, deliver improvements, connectivity and network efficiency to support economic growth whilst reducing the need to travel by private car, improve safety and tackle climate change. However, to achieve this, the Council must continue to support large scale planned development such as the Warrington Garden Suburb, which will, through proper planning and delivery management, deliver critical infrastructure in line with LTP4 (2019) objectives.
- 8.5 In light of the failure to plan for the proper number of homes to support economic growth policies, the Council's strategic policies on transport are not effective as they do not reflect the objectives of the WBC LTP 4 (2019).
- 8.6 The Transport Model Testing of the WBC Local Plan August 2021 evidence paper clearly shows a greater delay on the highway network (31% above 2016 scenario) than the Warrington Local Plan Testing: Transport Model Testing of the WBC Proposed Submission Version Local Plan and Highway Schemes in the Infrastructure Delivery Plan 13 March 2019 model (24%), despite the latter promoting greater growth including higher housing numbers at 945dpa. This is in part due to the increased levels of infrastructure provision provided by for example the WGS allocation. Not only would the WGS deliver critical infrastructure to mitigate the impact of development, but it would also deliver greater significant benefits to the wider community. More fundamentally it would deliver on LPT4 objectives to reduce movement by creating greater self-containment and encourage model shift through the provision of mass transit infrastructure planned in a location where housing growth and jobs coexist in the longer term.

### **Object – Transport Policies**

The proposed transport policies are not effective and do not reflect the evidence base.

### **Solution**

Reinstate Warrington Garden Suburb in full.

This would allow for more outlets to be opened across the garden suburb area in order to deliver greater transport infrastructure in accordance with WBC LTP 4 (2019) objectives LTP4 Mass Transit Package and LTP4 Cycling Package. Without the full reinstated Garden Suburb, the transport objectives will never be met.

Delivery rates across the Garden Suburb could achieve 342dpa based on an increased number of building outlets across the WGS area to 6. In other words, there could be as many as 5 housebuilders operating within the Garden Suburb. As a national land promoter having a regional house builder, we are confident the demand for homes in Warrington remains strong, in particular within the WGS location close to jobs.

### **Policy INF1 – Sustainable Travel and Transport**

Amend Policy INF1;

- To refer to LTP4 Mass Transit Package and LTP4 Cycling Package.
- Reinstate the A50 / Broad Lane enabler route to link to the 'D' which is a proposed link between Witherin Avenue and Dipping Brook Avenue.

### **Policy INF2 – Transport Safeguarding**

Amend Policy INF2:

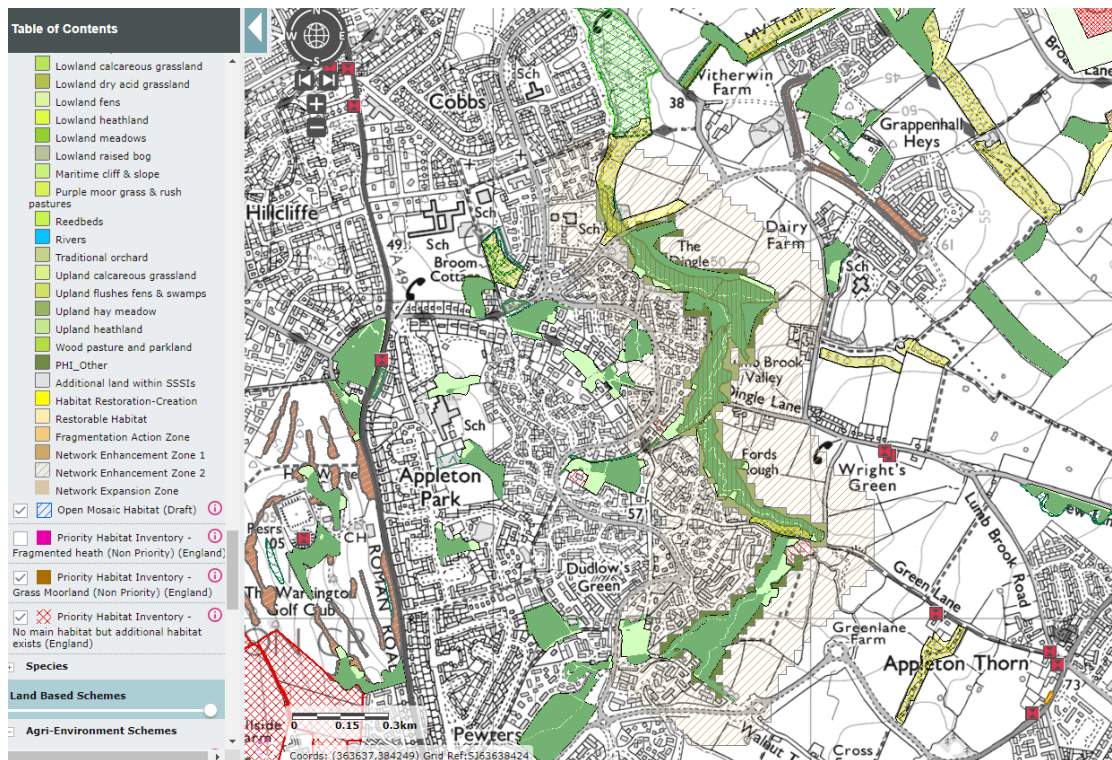
- To refer to land will be safeguarded for LTP4 Mass Transit Route linking A49 to A50.

## 9 Site Allocations

### Policy MD2 South East Warrington Urban Extension (SEWUE)

- 9.1 Whilst we support the location for significant growth, the proposed allocation will not deliver the homes required to meet Warrington’s need.
- 9.2 The capacity assumptions fail to have regard to the proper constraints of the area. For example, the western edges of the allocation alongside the existing urban edge form part of the National Habitat Network zone. These habitat zones have been identified as appropriate areas to introduce greater biodiversity objectives to encourage ‘more bigger, better and joined up’ ecological habitats. The zones are part of the Government’s 25-year Environment Plan which includes provisions for a Nature Recovery Network (NRN) where these areas can help the climate agenda and focus on delivery biodiversity net gains, which is currently a key objective of the Government. There is no evidence to demonstrate how any future masterplan addresses the NHN zones and as such capacity of the site may well be reduced. The allocation is therefore not effective in terms of capacity.

Source: Magic Map Application (defra.gov.uk)-



- 9.3 The eastern boundary is weak and non-defensible. Given the housing needs of Warrington, the Green Belt boundary will not endure beyond plan period and a further assessment will need to be undertaken. The allocation therefore fails to meet national policy tests in this instance and as such is unsound.
- 9.4 In terms of transport, the allocation fails to deliver the objectives of the LTP 4 which aims to plan transport infrastructure at major planned developments such as the Garden Suburb in order to encourage modal shift and bring transformational change to the Borough. The allocation is therefore not justified as it does not conform with the evidence base.

#### **Object – Policy MD2 South East Warrington Urban Extension (SEWUE)**

Whilst the location of the allocation is supported in principle, the boundaries are not justified by the evidence base.

In terms of capacity of the sites to deliver 4,200, there is no robust evidence to support this claim. The eastern boundary of the site is not durable. The allocation would therefore fail to deliver the homes required without the need to review Green Belt boundaries within the plan period and beyond. The allocation fails to meet wider policy objectives such as those contained within the LTP4 .

#### **Solution**

Expand boundaries to A50 Knutsford Road to create durable, long lasting Green Belt boundaries.

Increase capacity of SEWUE.

Reinstate Warrington Garden Suburb to deliver 5,100 and a further 1,800 beyond plan period in accordance with the existing evidence base.



### Policy MD3 Fiddlers Ferry

The location of site is not suitable for new homes. It lies in the narrow gap between Widnes and Warrington and development of unbuilt green field parts of the site will create coalescence between two major urban settlements and thereby undermine the core purpose of the Green Belt. The site is detached from Warrington and is more akin as an extended employment site at Widnes Waterfront.

9.5 The site should therefore be developed for employment uses only.

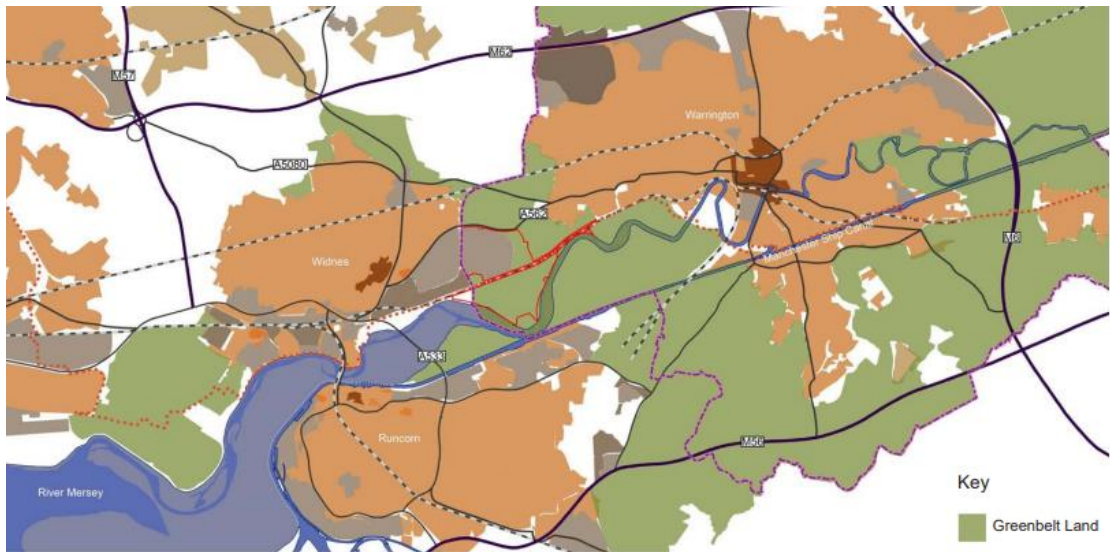
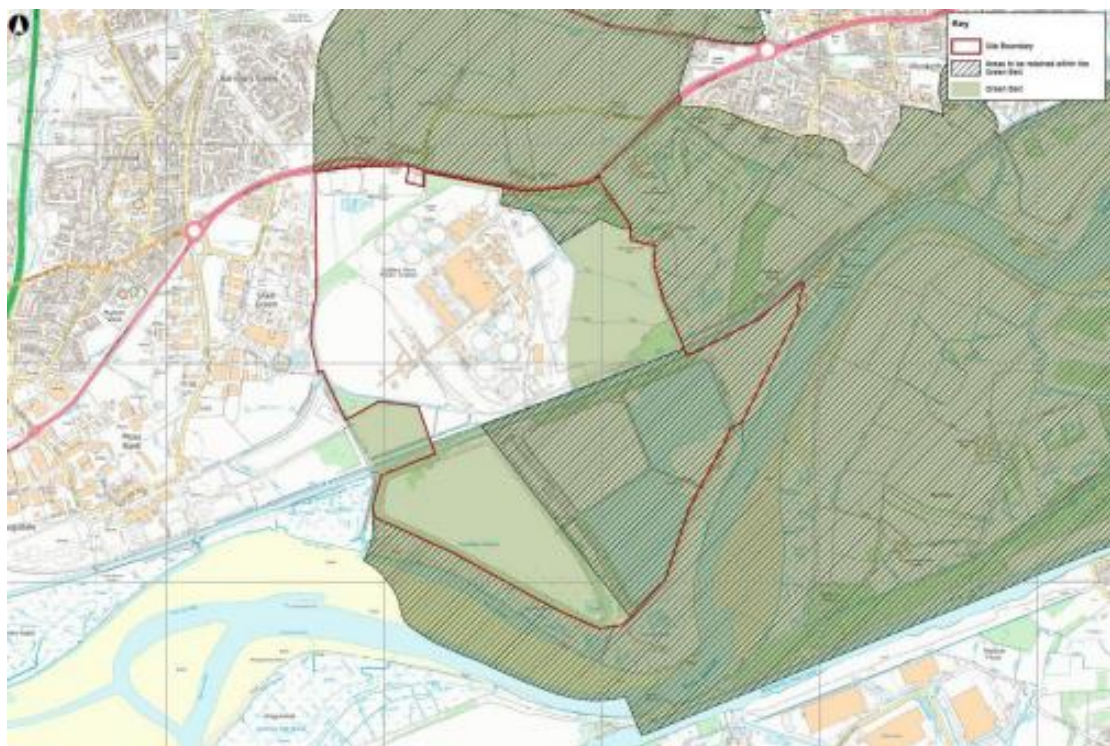


Diagram of the Adopted Local Plan Greenbelt



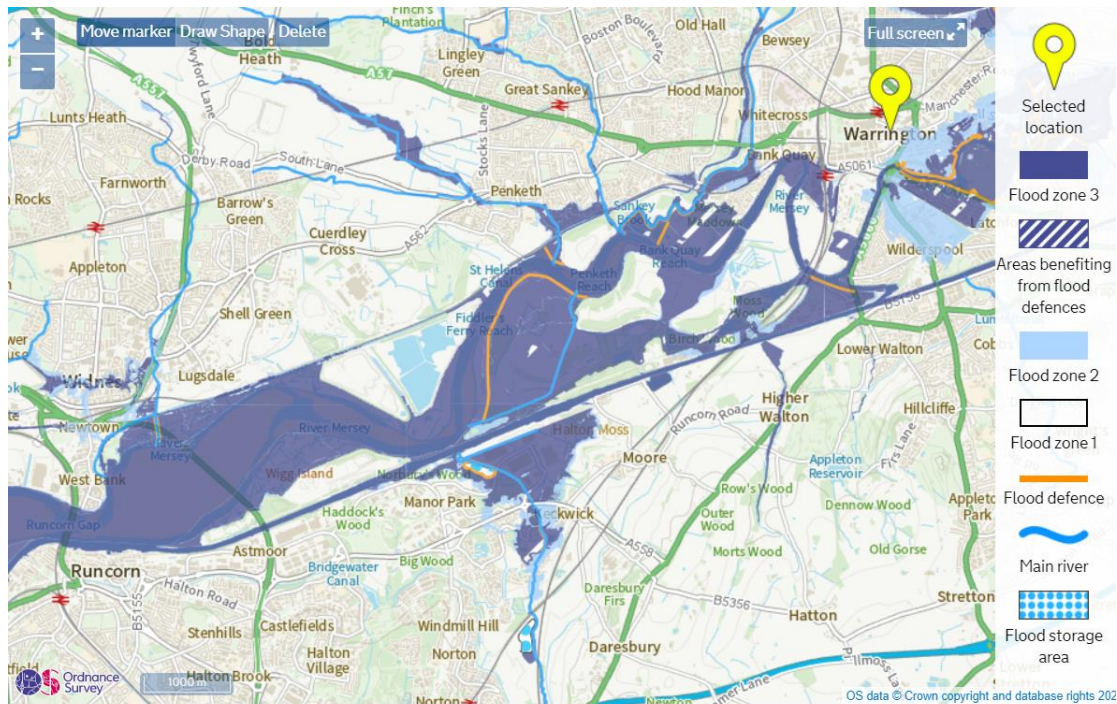
**Source: FIDDLER'S FERRY POWER STATION REGENERATION VISION SSE (August 2021)**

- 9.6 The Fiddler's Ferry site is proposed to deliver in two phases following demolition and remediation of the former power station. Phase 1 on land north of the railway line and Phase 2 on land to the south of the railway line. Phase 1 is for employment uses of 89 ha on brownfield land together with an adjacent residential neighbourhood of a minimum of 860 homes on green field land within the Green Belt. Phase 2 will deliver a second residential neighbourhood of a minimum of 900 homes.
- 9.7 The landowners evidence indicates that 'Phase 1 of Fiddler's Ferry can progress within the capacity of the existing transport infrastructure with potentially minor improvements to junctions east and west of the site access on the A562'. It further states that *'the impact of phase 2 will be assessed in consultation with Highways England in terms of wider impacts with funding streams and trigger points identified for the delivery of the further mitigation measures should they be needed to enable development to come forward'*. It is therefore clear that no consideration has been given to the infrastructure needs to accommodate this proposal or indeed the full impact it would have on the existing network. More critically, there is absolutely no certainty of what future infrastructure is required as a result on the impacts arising from the proposals. Significant infrastructure is required just to serve Phase 2 in that a new bridge over railway is required, adding even greater uncertainty and opening more questions as to the appropriateness of such a site for housing.

#### *Flood*

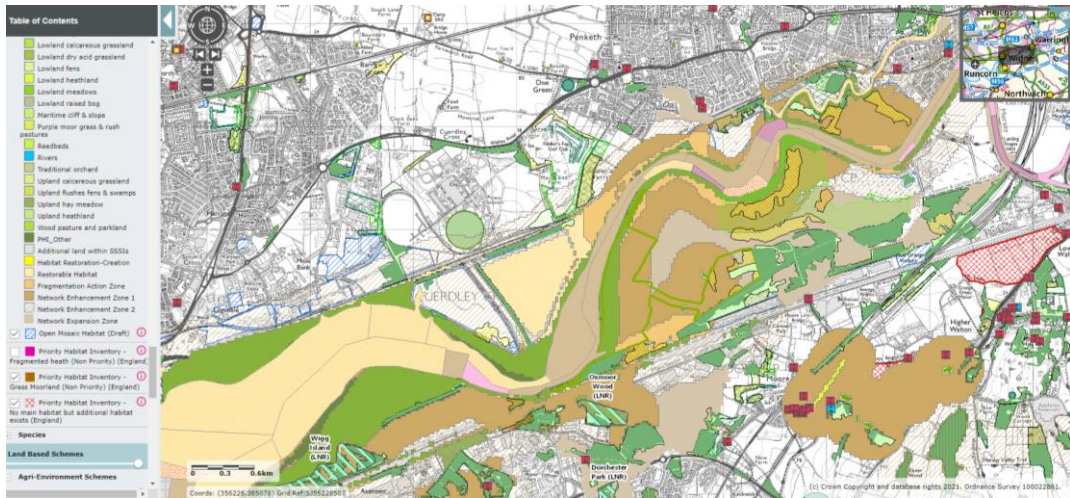
- 9.8 The southern part of site is susceptible to flood and changes in the River Mersey valley. No robust sequential test has been undertaken to support the allocation particularly the southern land parcel. Para 161 of the NPPF requires plans to apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change. As the southern parcel lies within the Mersey river valley and the floodplain is tidal in this part, the land may well be susceptible to sea level changes.





Source: EA Flood Mapping for Planning (November 2021)

- 9.9 There are flood defences in proximity of the site and with flooding becoming more prevalent in such locations we would expect a robust assessment of the land to understand future events to ensure land is safeguarded or can be used for current or future flood management
- 9.10 In terms of the sequential testing of proposed allocations. Para 162 NPPF encourages LPAs to steer development to areas with lowest risk of flooding from any source. We have not seen any evidence submitted to support the site in terms of sequential testing. Additionally, there is no evidence of an Exceptions Test undertaken to support the site ahead of available reasonable alternatives outside flood risk locations and as such no assessment of the wider sustainability benefits to the community (if any) that outweigh the flood risk have been provided.
- 9.11 The Council acknowledge the site lies in an area that is sensitive in terms of ecology. The site is also identified as Network Enhancement Zone 1 and 2. These habitat zones have been identified as appropriate areas to introduce greater biodiversity objectives to encourage ‘more bigger, better and joined up’ ecological habitats. The zones are part of the Government’s 25-year Environment Plan which includes provisions for a Nature Recovery Network (NRN) where these areas can help the climate agenda and focus on delivery biodiversity net gains, which is currently a key objective of the Government. There is no evidence to demonstrate how any future masterplan addresses the NHN zones and as such capacity of the site may well be reduced. The allocation is therefore not effective in terms of capacity.



Source [Magic Map Application \(defra.gov.uk\)](https://magic.defra.gov.uk) – River Mersey Ecological Corridor and National Habitat Network Mapped Area.

9.12 The southern portion of the proposed residential allocation lies within the Upper Mersey Estuary Local Wildlife Site. The evidence fails to justify the release of the site for homes.

**Object – Policy MD3 Fiddlers Ferry**

The delivery of homes on the site, as proposed, is not justified.

Amend policy to focus on brownfield only part of the site for employment only.

**Solution**

Expand boundaries to A50 Knutsford Road to create durable, long lasting Green Belt boundaries.

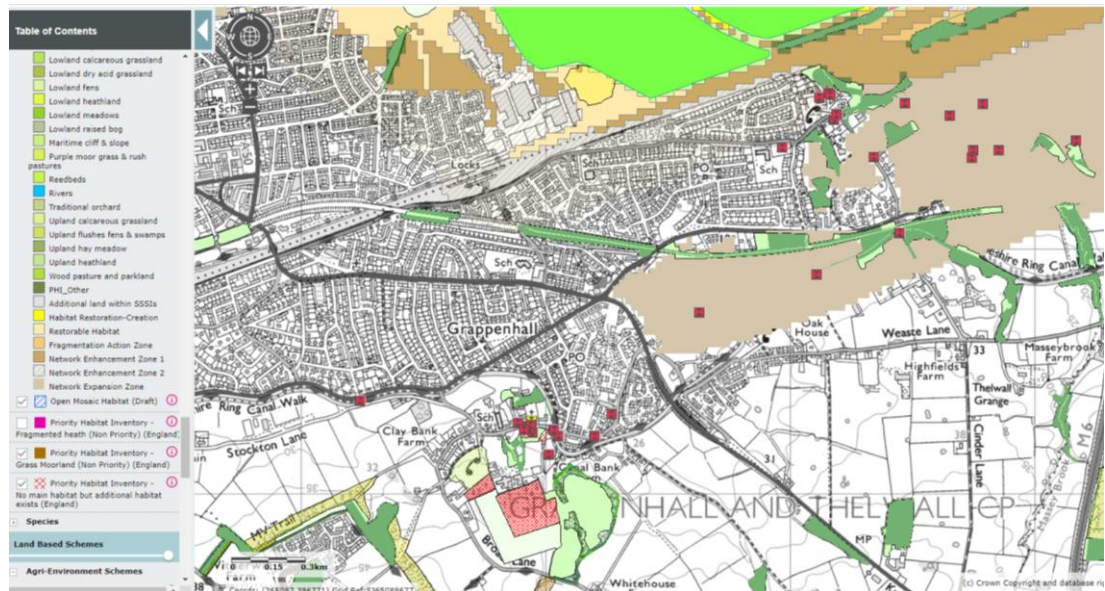
Increase capacity of SEWUE.

Reinstate Warrington Garden Suburb to deliver 5,100 and a further 1,800 beyond plan period in accordance with the existing evidence base.



### Policy MD5 - Thelwall Heys

- 9.13 The site forms part of the National Habitat Network zone. These habitat zones have been identified as appropriate areas to introduce greater biodiversity objectives to encourage ‘more bigger, better and joined up’ ecological habitats. The zones are part of the Government’s 25-year Environment Plan which includes provisions for a Nature Recovery Network (NRN) where these areas can help the climate agenda and focus on delivery biodiversity net gains, which is currently a key objective of the Government. There is no evidence to demonstrate how any future masterplan addresses the NHN zones and as such capacity of the site may well be reduced.
- 9.14 There are known heritage assets within the site which have not been properly assessed.
- 9.15 The allocation is therefore not justified and not effective in terms of capacity.



Source [Magic Map Application \(defra.gov.uk\)](https://defra.gov.uk)

### Object – Policy MD5 - Thelwall Heys

Unsound: Not Justified

The benefits do not outweigh the harm caused by removing land from the green belt in this location.

The SA does not assess the site against the WGS in terms of the harm and benefits from removing green belt land. The site will only deliver mitigation to compensate the development of 310-350 dwellings. There are no wider benefits proposed other than self mitigation outside of what would be expected from the development.

Should the 50 acres be removed in the WGS location, there would be a greater benefit to the community, given the ability to deliver wider benefits as part of a planned garden suburb such as a new country park, new road connections to A50 providing greater east / west transport links from the A49 and A50 in addition to facilitating mass transit corridors and thereby delivering on the objectives of the LTP4 (2019)

The allocation is therefore not justified by the evidence base and a reasonable alternative exists.

### Solution

Reinstate Warrington Garden Suburb and redirect 350 dwellings to it.

Sound approach supported by the existing evidence base.

### Outlying Settlements

- 9.16 There is no evidence to support the specific allocations at the Outlying Settlements.
- 9.17 There are no exceptional circumstances provided to justify the need for the allocations at these settlement or scale of land release from the Green Belt.

**Object – Site Allocations to Outlying Settlements**

**Policy OS1 - Croft**

**Policy OS2 - Culcheth**

**Policy OS3 - Hollins Green**

**Policy OS4 - Lymm – Pool Lane / Warrington Road**

**Policy OS5 - Lymm – Rushgreen Road**

**Policy OS6 - Winwick**

Unsound: Not Justified

The benefits do not outweigh the harm caused by removing land from the green belt in these locations through strategic planning policies.

**Solution**

Amend strategy to include a revised policy to allow for land to be released at the outlying settlements based on housing need.

Reinstate Warrington Garden Suburb and redirect 801 dwellings to it.

Supported by existing evidence. Sound approach, which is positively prepared, effective, justified and supported by national planning policy.

## 10 Monitoring and Review:

Policy M1 Monitoring and Policy Review.

- 10.1 The proposed policy fails to include flexibility in the plan and provides no contingencies if sites fail to deliver in line with the trajectory.
- 10.2 There is a need to identify safeguarded land in order to ensure the Council has a contingency option to meets it housing obligations over the plan period.

## 11 Sustainability Appraisal

11.1 The SA is flawed in that it fails to;

- Assess Warrington Garden Suburb (WGS) as an option to meet demographic need and LTP4 objectives;
- Assess impact of Outlying Settlements in terms of movement patterns;
- Assess local housing need in Outlying Settlements;
- Assess WGS as a single option to deliver homes (5,100 in plan period);
- Assess WGS as a single option to deliver homes beyond the plan period;
- Assess WGS as safeguarded land option.