

Date: 15 November 2021  
Our Ref: Land at Heathcroft Stud, Croft

**Local Plan, Planning Policy and Programmes**

Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
WA1 2NH

[REDACTED]

Dear Sir/Madam,

**WARRINGTON UPDATED PROPOSED SUBMISSION LOCAL PLAN 2021-2038  
The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)**

This representation has been prepared Bellway Homes Manchester (“Bellway”) to respond to the Warrington Local Plan Updated Proposed Submission Version (“WLPSV”) (2021) which runs from Monday 4<sup>th</sup> October and closes at 5pm on Monday 15 November 2021, in relation to Land at Heathcroft Stud, Croft (“the site”). A Site Location Plan is enclosed at Appendix 1. Bellway’s previous representation to the 2019 consultation (including a Development Statement for the site, Transport Note and Illustrative Layout) can be found at Appendix 2 for context.

Bellway’s representations build on the previously submitted information; make comment on the relevant updated strategic policies, site specific policies and the evidence base which underpins the emerging Local Plan document. They demonstrate that the site at Heathcroft Stud is available, suitable and achievable and therefore deliverable as a site for housing and outline the specific benefits that the allocation of the site for housing will bring to the local area.

Warrington Borough Council’s (WBC) own assessment of the site through its updated August 2021 Green Belt Assessment identifies that the site makes a weak contribution to the five purposes of the Green Belt. Further it outlines development of the site would not represent encroachment into the countryside as the majority of the site is currently in use as Heathcroft Stud (equestrian use) therefore the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Croft. Bellway strongly supports this overall conclusion and WBC’s decision to include the site for Green Belt release and a housing allocation in the emerging Local Plan. It has also been demonstrated there are no known technical or environmental constraints that will preclude the delivery of housing on this site.

Bellway have raised concerns within other representations to this consultation, with some of the development management policies included with the WLPSV (notably draft policies DEV2 and ENV7), however such concerns are not repeated within this site-specific representation to avoid unnecessary repetition.



Bellway is proud to be supporting Cancer Research UK as their charity of the year.

Registered Office: Bellway Homes Limited, Woolsington House, Woolsington,  
Newcastle upon Tyne, NE13 8BF. Registered in England Number 670176  
Bellway Homes Limited is a member of the Bellway p.l.c. Group of Companies

## Policy DEV 1

Bellway strongly supports the sustainable growth of Warrington. The draft Local Plan proposes to deliver 14,688 new dwellings between 2021 and 2038, which has been calculated using Central Government's revised 'standard methodology'. Bellway are fully supportive of the standard methodology but emphasise that the methodology identifies a minimum figure. In order to meet this target, WBC will need to release Green Belt land for housing. The WLPSV has demonstrated that in order to meet its development needs, exceptional circumstances for Green Belt release exist.

In addition to large strategic allocations identified in Policy DEV 1, the emerging Plan makes a number of more modest allocations, which are immediately deliverable and do not require any significant infrastructure investment to facilitate their delivery, including 'Land at Heathcroft Stud, Croft'. Bellway strongly supports the proposed Green Belt release at Croft for a minimum of 75 homes in draft Policy DEV1 at point 4b. 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 69 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. Local Authorities should therefore ensure their Local Plans allocate a sufficient number of small and medium sites, such as Land at Heathcroft Stud, Croft to safeguard the Borough's five-year housing land supply.

## Policy OS1

The site is proposed for housing allocation under Policy OS1 in the WLPSV, which is strongly supported by Bellway. The NPPF and the Government's growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply, support growth and boost home ownership. The site is available, suitable and achievable and is ideally positioned to deliver housing. The site should be released for housing, as it will positively contribute towards meeting Warrington's open market and affordable housing needs.

Bellway makes the following specific comments on the requirements:

### New Homes

- Firstly, in relation to point 2 of the Policy, whilst Bellway does deliver housing to meet everyone's requirements, provision and extent of such should be assessed and agreed on a site-by-site basis between the Council and the developer, having regard to local needs, the Council's latest evidence base and viability at the time of any planning application. A suitable caveat should be included within the wording of point 2. Bellway have separately submitted representations raising concern with draft policy DEV2 'Meeting Housing Needs'.
- Secondly, in relation to point 4 of the draft policy and the requirement for provision of self-build / custom build plots on the site, the Council should base this requirement on the evidence base. It is understood that the Council's self-build register shows a need for self-build plots, which is very limited and does not justify provision being

sought on all allocated housing sites. There is a need for the smaller housing sites such as Croft to deliver housing quickly so that the Council can demonstrate a 5-year supply because the larger strategic sites will rely on the delivery of infrastructure, which means housing delivery will be slower. It is therefore proposed that sites that are under control of major housebuilders such as Bellway are not requested to deliver self-build / custom build provision and that more appropriate sites are selected. It is therefore requested that point 4 is removed or amended so that flexibility is applied.

#### Open Space and Recreation

- Thirdly, on points 8 and 9 of the draft Policy 'Open Space and Recreation'. Whilst Bellway does not object to the principle of the requirement, Bellway will reserve the right to comment on any methodology established in relation to financial contributions for playing pitches and indoor facilities and would not support a policy requirement for playing pitches and leisure facilities; if this threatened the viability and/or deliverability of the site.

#### Natural Environment

- Fourthly, in relation to point 11 (biodiversity net gain), the policy should seek to encourage biodiversity net gain to be incorporated into the overall design concept but any mandatory requirement for a net gain to be achieved via the metric calculator should be deleted (the metric calculator being only one way to calculate net gain).

#### Green Belt

- Fifthly, point 13 of the draft policy requires a scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt. The PPG states that authorities should set out policies for compensatory improvements informed by supporting evidence and opportunities could include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements and new walking routes. The PPG goes on to say that there should be early engagement with all interest groups to consider matters such as the scope of works required. The Council has not set out any indication that such early engagement has taken place and there is no evidence to support its requirement for compensatory measures. There is no indication as to what such measures would consist of or what the implications may be for viability. It is unclear as to how an applicant, and the decision-maker, may interpret and respond to this policy requirement and we would suggest that this requirement is deleted or clarified.

In summary Bellway strongly supports the allocation of the site and its proposed release from the Green Belt. The site represents a fully deliverable site, capable of being delivered in the first 5 years of the plan period to help meet housing and affordable housing need. Bellway has made some suggested changes to the wording of the draft policy, which it requests are made in the next version of the Local Plan.

#### Conclusions

Overall, Bellway are supportive of the principle of Policy OS1, subject to the comments and suggestions above which it is submitted would improve the effectiveness and therefore soundness of the policy. Bellway would like to participate in the hearing session for the proposals at Croft, during the Local Plan Examination.

Should you have any queries in relation to these representations or should the Council wish to prepare a Statement of Common Ground in relation to the allocation in advance of the examination hearings, please do not hesitate to contact me.

Yours sincerely



**Jonathan Penrose**

