
Warrington Updated Proposed Submission Draft Local Plan 2021 - 2038

Representations on Behalf of Miller Homes

November 2021

**Warrington Updated Proposed Submission
Draft Local Plan 2021 – 2038**

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1.0 INTRODUCTION

1.1 Barton Willmore is instructed by Miller Homes (herein 'Miller') to submit representations to the Warrington Updated Proposed Submission Version Local Plan 2021-2038 (WLP).

1.2 Miller has a number of land interests within Warrington and will play a key role in delivering the Borough's largest development allocation contained in the WLP, the South East Warrington Urban Extension (SEWUE), alongside Homes England. Site specific representations in relation to the SEWUE have been prepared jointly with Homes England and submitted under separate cover by both parties, which consists of a document containing representations to the WLP, relevant to the SEWUE only, and a Deliverable Allocation document.

1.3 These representations present Miller's wider comments on the WLP with an emphasis on its other land interests in the Borough, namely:

- Hatton Lane, Stretton;
- Hollins Lane, Winwick;
- Smithy Brow, Croft; and
- Cherry Lane, Lymm.

1.4 The locations of these sites are explained in detail within Section 3 of these representations, alongside further details of the extent of the deliverable residential developments that these opportunities offer. These sites have all been the subject of previous submissions on behalf of either Miller or Wallace Land Investments. Further details of these submissions are set out in Section 2.

1.5 The latest iteration of the WLP follows on from the Proposed Submission Version Local Plan published for consultation in March 2019. The WLP now subject to consultation has been the subject of a number of significant changes since the previous iteration, which the Council has attributed to responding to consultation comments and the impact of the COVID-19 pandemic.

1.6 The WLP has now reached the publication stage, therefore comments made within these representations will be structured around the tests of soundness as set out at Paragraph 35 of the NPPF. These are listed below for clarity.

1.7 Paragraph 35 states that plans will be considered to be 'sound' if they are:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

1.8 These representations will be structured as follows:

- Section 2 – Miller Homes and Previous Involvement with the Warrington Local Plan;
- Section 3 – Site Background;
- Section 4 – Representations on Strategic Planning Policies;
- Section 5 – Representations on Site Allocations; and
- Section 6 - Summary and Conclusions.

2.0 MILLER HOMES AND PREVIOUS INVOLVEMENT WITH THE WARRINGTON LOCAL PLAN

Miller Homes

- 2.1 Miller Homes is a respected national homebuilder with a focus on building high quality family homes in established regional markets. They operate from three divisions – Scotland, North of England, and Midlands & South. They have nine regional offices with a strong presence in sought after suburban locations which continue to benefit from high levels of demand.
- 2.2 Despite the impact of the COVID-19 pandemic in 2020, Miller delivered its ninth consecutive year of profit, building 2,620 homes throughout England and Scotland.
- 2.3 The North West Region is on target to deliver around 400 homes in 2021, increasing to 500 in 2022.
- 2.4 The acquisition by Miller of Wallace Land Investments earlier this year saw the Group's strategic land portfolio increase by circa 18,000 plots, including significant land interests in Warrington in particular.

Previous Representations

- 2.5 Previous representations have been submitted by Miller and Wallace Land Investments to various stages of the WLP preparation process.
- 2.6 The most recent representations were submitted in June 2019 in response to the first iteration of the Proposed Submission Draft WLP. A representation was made regarding each individual land interest listed in Section 1 and these are appended to these representations for completeness.

3.0 SITE BACKGROUND

3.1 As set out above, Miller's land interests in the case of these representations comprise the following sites:

- South East Warrington Urban Extension;
- Hatton Lane, Stretton;
- Hollins Lane, Winwick;
- Smithy Brow, Croft; and
- Cherry Lane, Lymm.

3.2 The locations of these sites and a brief background to each of them is provided below. Appended to these representations are previous correspondence regarding the first Proposed Submission Draft of the WLP, which contain detailed assessments of each site. These should be read in conjunction with this representation.

South East Warrington Urban Extension

3.3 The SEWUE is the single largest allocation for development proposed in the WLP, reflective of its strategic positioning and ability to deliver much needed new homes and supporting infrastructure. The site extends to approximately 252 hectares and has the potential to deliver at least 4,200 new homes and associated physical and community infrastructure, with no less than 2,400 homes being delivered in the Plan period. Miller, who's land interests within the SEWUE extend to approximately 39 hectares of the SEWUE, has been promoting the site in partnership with Homes England, who control the rest of the site.

3.4 Miller's land interests within the SEWUE have been the subject of previous representations, made on behalf of Wallace Land Investments at the time, through the earlier stages of the WLP's preparation, including to the previous Regulation 19 consultation in 2019. Since that time Miller and Homes England have been actively working with the Council and statutory consultees to advance a deliverable and viable framework for the site's development.

3.5 As stated above, Miller's representations in respect of the SEWUE and its related WLP interests have been prepared jointly with Homes England and are contained in two separate documents submitted by each party. This representation therefore focuses on Miller's wider comments in response to the WLPs strategic and development

management policies, and the site-specific interests of Miller's land interests beyond the SEWUE. Miller makes clear in its joint representations with Homes England that it is committed to delivering the SEWUE as a fundamental element of Local Plan's strategy, which is broadly sound. The comments set out within this representation do not detract from Miller's support and commitment to the SEWUE.

Hatton Lane, Stretton

- 3.6 The land in question measures circa **27 hectares** and lies to the west of Stretton. While located close to the proposed SEWUE, it would remain separate from it following the completion of the SEWUE.
- 3.7 Detailed representations were submitted by Wallace Land Investments in June 2019 in response to the consultation on the first Proposed Submission Draft of the WLP. This shows that the site has the potential to accommodate circa **550 homes**.
- 3.8 These representations are enclosed at **Appendix 1**.
- 3.9 It should be noted that since the submission of these representations additional design work has taken place and an amended Indicative Development Framework has been produced. This is provided at **Appendix 2**. The changes do not materially change the excellent opportunity present in this location.

Hollins Lane, Winwick

- 3.10 The site currently comprises **7.2 hectares** of agricultural land.
- 3.11 It has been the subject of a Development Framework document prepared by Barton Willmore. This was included in representations on the first Publication Draft of the WLP at **Appendix 3** of these representations.
- 3.12 The document undertakes a detailed analysis of the site and concludes that it is suitable to accommodate circa **100 homes** with access from Hollins Lane.

Smithy Brow, Croft

- 3.13 The site measures circa **4.08 hectares** and is located to the west of Croft.

- 3.14 Representations were prepared by Wallace Land Investments to the first Publication Draft of the WLP which concluded that the site was capable of accommodating circa **90 homes**.
- 3.15 The previous representations are appended at **Appendix 4**.

Cherry Lane, Lymm

- 3.16 This land was promoted by Wallace Land Investments via representations to the first Publication Draft of the WLP. These representations are appended at **Appendix 5**.
- 3.17 The aforementioned representations include a detailed assessment of the potential of the site to accommodate residential development. It is concluded that the site has the capacity to deliver circa **200 homes** in a sustainable location.

4.0 REPRESENTATIONS ON STRATEGIC PLANNING POLICIES

4.1 As previously stated, given that the WLP is now at the Proposed Submission stage, this representation focuses on matters of soundness as listed at Paragraph 35 of the NPPF. The following section will discuss relevant planning policies of the WLP in turn and explains why the policies are not currently considered to be sound. It should be emphasised at this juncture that Miller does not question the soundness or appropriateness of the overall Plan strategy and considers that with the changes suggested below, the policies in question can also be made sound.

Policy DEV1 – Housing Delivery

DEV1 – Housing Delivery		
Para 35 Test	Sound?	Summary
Positively Prepared	No	The heavy reliance on Town Centre brownfield creates a significant risk of development need going unmet.
Justified	Yes	
Effective	No	Will not meet housing needs during the plan period.
Consistent with National Policy	No	Contrary to para 69 of the NPPF and PPG owing to the use of a stepped requirement without appropriate justification.
Amendments Required		
Allocate additional sites adjacent to outlying settlements and the urban area.		

Distribution of Housing

4.2 For of the distribution of the Borough's housing, the Policy is clear that the majority of new homes will be delivered within the existing main urban areas of Warrington, existing inset settlements, and other sites identified in the SHLAA.

4.3 These sources combine to total a minimum identified deliverable capacity of 11,785 new homes, according to DEV1. This equates to 654 homes per year, for the duration of the 18-year Plan period, coming forward from currently identified mainly brownfield sources.

4.4 Miller identify two potential issues with the realism of this coming forward, amounting to a concern over the success and soundness of the Policy.

4.5 The first point is that the annual minimum delivery needed from SHLAA sites greatly exceeds that which has been achieved in the last 5 years. It should be noted that the

housing supply identified within the SHLAA is mainly on previously developed land (PDL) because Green Belt land was not considered as suitable for inclusion (paragraph 2.19 of the SHLAA).

- 4.6 This is shown in the table below which states the quantum of homes delivered on previously developed land as taken from the Annual Monitoring Report of that year.

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

- 4.7 While the delivery fluctuates year on year, as would be expected, the common trend is that the figure does not come close to reaching 654 homes, as required to meet DEV1.
- 4.8 This is despite a lack of real alternatives available in terms of housing sites owing to the Green Belt constraints of the Borough, severely limiting opportunities to build on undeveloped land.
- 4.9 The past trend of homes delivered on PDL are an indicator that the Council is potentially over reliant on SHLAA sites to meet its housing requirement. As such, DEV1 does not meet the Borough's objectively assessed need for housing and is not deliverable over the Plan period.
- 4.10 The second point is that of the sites identified as deliverable in the Plan period, a significant number of these are larger sites located in the town centre.
- 4.11 Miller agrees that the town centre is a logical and sustainable place to focus some high-density residential development through the WLP.
- 4.12 However, over 2,100 of the homes identified are only identified as deliverable in the medium and longer term. None of these benefit from planning permission, and some are currently in active employment use. This leaves significant uncertainty regarding the ability of these sites to be delivered within the Plan period.

- 4.13 Furthermore, the Viability Assessment that informs the WLP concludes that the majority of sites identified in lower value areas, such as the Town Centre, have viability issues that may affect their delivery (Viability Assessment – Paragraph 8.5).
- 4.14 This raises the possibility that their delivery will need to be supported by public monies and heightens the uncertainty associated with the delivery of these sites.
- 4.15 The reliability on the town centre to deliver a significant proportion of the housing requirement therefore carries significant risk due to the uncertainty associated with the deliverability of key sites here.
- 4.16 The WLP is therefore not deliverable in this regard, based on the evidence available.
- 4.17 To remedy this position, the WLP should seek to increase the number of green field sites in better market areas which offer much more certainty of delivery within the Plan period and the potential to viably deliver affordable housing.
- 4.18 The potential impact of the non-delivery of sites is particularly acute in Warrington given the restrictions of Green Belt resulting in no alternative source of delivery without undertaking a time-consuming local plan review. In the meantime, the housing needs for the Borough would go unmet.
- 4.19 The sites controlled by Miller, referred to in this representation, offer the opportunity for such alternative or additional sites that can quickly deliver the homes within the short to medium term.
- 4.20 The Policy also proposes the delivery of 801 homes through Green Belt released in the outlying settlements of Croft (75), Culcheth (200), Hollins Green (90), Lymm (306), and Winwick (130).
- 4.21 Miller agrees that based on the established need for housing and associated housing requirement, there is a need for development to be accommodated in these outlying sustainable settlements.
- 4.22 However, given the aforementioned uncertainty associated with delivering the scale of housing proposed on previously developed land in the town centre, additional land should be allocated within these outlying settlements to add security to the housing land supply within the WLP.

- 4.23 Comments on the justification for Green Belt release and on individual proposed allocations are set out later in this section and in Section 5, respectively.
- 4.24 Miller's land interests in Croft, Lymm, Hatton Lane, Stretton and Winwick have the potential to provide these additional allocations in locations that are in accordance with the existing spatial strategy of the WLP.

Stepped Housing Requirement

- 4.25 The Council has stated that a stepped requirement will be used so that in the first 5 years of the Plan period the housing requirement is 678 homes per annum. This then rises to 870 homes per annum between years 6 to 18.
- 4.26 The Council's justification for this, as set out at paragraph 4.1.19, suggests that the stepped requirement is a direct response to the SHLAA sites and allocations in the trajectory, rather than offering a specific evidence-based justification.
- 4.27 Paragraph 69 of the NPPF requires local planning authorities to consider a good mix of sites that can deliver across the plan period. In stating that a stepped requirement is needed the WLP is effectively acknowledging that the requirement to achieve a range of sites has not been met and that the WLP is not identifying sufficient land to meet the Borough's housing needs in the first five years of the Plan.
- 4.28 The PPG (Paragraph: 021 Reference ID: 68-021-20190722) is clear that a stepped requirement may be appropriate in certain circumstances, however, evidence is required to justify this approach so that it is not unduly delaying meeting development needs.
- 4.29 The Council has not produced clear and robust evidence to justify this and therefore the stepped requirement is not sound.
- 4.30 The justification of a stepped requirement that is provided by the Council currently relates to the lead-in time associated with the delivery of larger Green Belt release sites. It should be noted at this juncture that Miller does NOT object to the allocation of such sites as they will play a key role in meeting the overall housing requirement, including beyond the Plan period.
- 4.31 What is not discussed in the justification is the presence of significant elements of town centre regeneration that is relied upon in the latter part of the Plan period. This delay and the potential issues associated with delivery mean that alternative small and medium

sized sites should be sought to meet the housing requirement earlier in the Plan period, thus enabling the application of a constant housing requirement of 816 homes per annum and providing more certainty that the overall housing requirement can be met over the Plan period.

- 4.32 A further consideration is the fact that the Council cannot presently demonstrate a five-year housing land supply (3.7 years in April 2019). This position is likely to have worsened since the publication of this document.
- 4.33 Indeed, the Housing Delivery Test results for 2020 show that Warrington has only delivered 57% of its housing requirement, thus invoking the presumption in favour of sustainable development.
- 4.34 While the use of the Standard Method as a basis for the housing requirement means that this shortfall is catered for, adopting a stepped requirement will mean that housing needs will go unmet until later in the plan period. This will exacerbate current issues concerning the shortfall in delivery which are already acute.
- 4.35 Policy DEV1 states that the Council will only give due consideration to a review or partial review of the Local Plan, this is not a firm commitment. In the context of potential supply issues highlighted above, it is necessary to include a robust mechanism to ensure that the Council can demonstrate and maintain a delivery 5-year housing land supply throughout the Plan period.
- 4.36 This should comprise a partial review of the Local Plan if necessary, triggered after a period of under-delivery (such as 3 years). This will provide greater certainty to developers in relation to the circumstances when further land release will be required. This should be applicable to the overall housing requirement figure rather than the phased trajectory currently proposed.
- 4.37 The approach as drafted is contrary to Paragraphs 31 to 33 of the NPPF that clearly sets out the need for Local Plans to be underpinned by relevant and up-to-date evidence and should be reviewed every 5 years.

Housing Supply Beyond the Plan Period

- 4.38 The justification to Policy DEV1 states that it is the Council's belief that the housing development requirements beyond the Plan period (2038 to 2050) are adequately met

by various sources and, therefore, no additional allocations need to be made for this purpose.

- 4.39 The matter of meeting development needs beyond the Plan period is particularly pertinent in the case of the WLP because of the constraints of Green Belt upon the ability of the settlements to expand, and because it is rightly proposing the alteration of Green Belt boundaries.
- 4.40 Paragraph 140 of the NPPF is clear that the intention of Green Belt is permanence in the long term and therefore changes should be able to endure beyond the Plan period. Paragraph 143 goes on to state that it may be necessary to identify safeguarded land, removed from the Green Belt, in order to meet this long-term need.
- 4.41 Miller has concerns relating to the assumptions used by the Council to inform their view that Green Belt boundaries will not need to be altered again beyond this plan period.
- 4.42 The annual need for housing beyond the plan period set out by the Council is for 605 homes. This is the annual average of household growth between 2028 and 2038 as taken from the 2014 based household projections. As such, it is the starting point for establishing the result of the Standard Method figure.
- 4.43 The Council is working on the assumption that owing to the delivery of homes through the WLP, affordability of housing will no longer be a significant issue in 2038.
- 4.44 While the rationale behind this is understood, it is at best an optimistic, and at worst a naïve position to take.
- 4.45 This is amplified by the fact that the housing requirement for the WLP is already the minimum acceptable level and does not account for any additional economic growth. This is not therefore an ambitious target to mark a step change in the housing market of Warrington.
- 4.46 It is considered that a more rational and straight forward approach would be to 'roll over' the current requirement for an additional 12 years beyond the Plan period to determine the extent of Green Belt release or safeguarding that is required to avoid a further Green Belt review at the end of the Plan period, or even sooner. This creates a more realistic scenario.

- 4.47 If this is done the need for housing over the 12-year period will rise from 7,260 to 9,792. An increase of 2,532.
- 4.48 This is a significant uplift and means that even if the Council's proposed supply of 7,487 is taken as read, there would be a deficit of 2,305 over the 12-year period.
- 4.49 Concerns also exist in relation to the Council's indicative supply as identified in Table 2 of the WLP.
- 4.50 The source of the additional supply within 'Plan for flexibility figure' of 1,948 is unknown at the current time. The 10% flexibility set out in Table 1, which sets out the land requirements for the Plan period, shows 1,469. This is 479 homes difference. The Council will need to provide evidence to underpin this figure.
- 4.51 The suitability of using the flexibility in the supply for the Plan period to meet the housing needs beyond it is also questioned. The contingency has been applied in order to allow for the slippage and non-delivery of some sites. As such, by definition some of this will be required to make up for the resulting shortfall during the Plan period.
- 4.52 As an acknowledgement that the availability of brownfield land suitable for development will likely reduce beyond the Plan period, the Council includes a figure of 3,024 (252 per annum over 12 years) homes in the supply. The figure adopted, however, does not appear to be based on any current evidence and the Council will need to justify the use of this figure, otherwise the robustness of this supply assumption must be called into question.
- 4.53 Therefore, it is clear that owing to a higher requirement being applied and issues with the identified supply, there is a significant shortfall in supply beyond the Plan period. The constraints of the Borough mean that it is an inevitability that further Green Belt release will be required beyond the Plan period to meet future needs.
- 4.54 The allocation, or as a minimum safeguarding, of further suitable Green Belt sites is therefore required to ensure compliance with the NPPF and ensure that the Green Belt boundaries established by the WLP have a sense of permanence. Without this we do not believe that the Plan can be considered sound in terms of its effectiveness and consistency with national policy where the approach to Green Belt land release is concerned, and the extent to which it provides a solution that will endure beyond the Plan period as required.

- 4.55 The sites put forward by Miller through the Local Plan process offer deliverable opportunities to assist in meeting identified potential shortfalls during the Plan period and beyond, whether as housing allocations or safeguarded sites.

Policy DEV2 – Meeting Housing Needs

DEV2 – Meeting Housing Needs		
Para 35 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	No	There is no evidence presented to justify 100% of homes being built to M4 (2) standard.
Effective	Yes	
Consistent with National Policy	No	Elements of the policy are unclear and ambiguous and therefore fail to meet paragraph 16 of the NPPF.
Amendments Required		
Evidence should be presented to justify the requirement for 100% of new homes built to meet M4 (2) standard. If this is not possible then a requirement that matches the evidenced need should be used.		
More clarity should be provided in terms of what is meant by housing for older people and how this can be accommodated within developments of 10 or more homes.		

- 4.56 The policy requires all new build homes to conform to Part M4 (2) of building regulations in terms of being accessible and adaptable, where it is viable and technically possible to do so.
- 4.57 It is acknowledged by Miller that there is a need for housing that is accessible within new development to meet the current and projected needs of an ageing population; however, a 100% requirement has not been justified within the Local Housing Needs Assessment. This is also the case for justifying the need for 10% of homes to be M4 (3) standard.
- 4.58 While having adaptable and accessible dwellings available to allow older people to stay in their homes if required is sensible, the churn associated with the need to downsize is a fundamental part of the housing market and opens opportunities for families and younger people to access the larger homes that they require.
- 4.59 The current wording of the requirement for housing for older people is unclear because there is no clear definition of what this is.
- 4.60 While the explanatory text at paragraph 4.1.61 refers to dwellings at M4 (2) and / or M4 (3) standard having a positive impact on meeting the needs of older people, in terms of suitable housing available during the Plan period, it is not clear if the requirement to

accommodate housing for older people means that development of 10 dwellings or more will only need to accommodate development at these standards, which is required by the Optional Standards section of the policy regardless.

- 4.61 If so, this represents unnecessary repetition and is not compliant with paragraph 16 of the NPPF, which requires that policies serve a clear purpose and avoid unnecessary duplication.
- 4.62 The explanatory text also references sheltered housing and Care Homes at paragraph 4.1.63. However, neither of these would be suitable to accommodate on a smaller site. As such, it is unclear to those reading the policy what is being asked for on sites of 10 or more homes.
- 4.63 The Council should clarify the requirements of this policy so that it is clear what is to be provided, and at what quantity.

Policy GB1 – Green Belt

GB1 – Green Belt		
Para 35 Test	Sound?	Summary
Positively Prepared	No	The current boundary of the Green Belt does not allow development to meet the needs of the Borough.
Justified	No	Evidence suggests that town centre redevelopment is unviable and therefore there is a significant risk that this will not come forward.
Effective	Yes	
Consistent with National Policy	No	The current boundary is likely to fail to meet the NPPF requirement at paragraph 140 of the NPPF to endure beyond the Plan period.
Amendments Required		
Additional land should be allocated, or safeguarded, to meet the needs within and beyond the Plan period.		
The wording of provision 11 should be changed to the following:		
<i>Where development proposals result in land being removed from the Green Belt, or are part of an allocation on land formerly in the Green Belt, a scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt will be required to be provided. Financial contributions will be considered where this would help to ensure that</i>		

the benefits of compensatory improvements can be maximised by providing them in the most appropriate location.

- 4.64 There are clear exceptional circumstances to justify Green Belt release at the Borough level in order to meet development needs across the Plan period and beyond.
- 4.65 The Council has adopted a housing requirement that seeks to meet the bare minimum acceptable under the NPPF.
- 4.66 The Council's SHLAA has fully evaluated available sites in the Borough and established the capacity for housing on non-Green Belt sites. As stated earlier, this capacity is optimistic given delivery constraints particularly around the Town Centre, and so this capacity may be lower.
- 4.67 However, even against the lowest housing requirement possible, which takes no account of possible economic growth, and an inflated housing supply in the SHLAA, there remains a 2,903 homes deficit (WLP Table 1).
- 4.68 This deficit is against the local housing need / housing requirement alone and without any additional flexibility to take account of potential slippage and/or to allow for market choice.
- 4.69 If the 10% increase proposed by the Council to allow for flexibility is added to the requirement, then the deficit is 4,372 homes (WLP Table 1).
- 4.70 This is a significant shortfall in the housing land supply across the Plan period and meeting this need for market and affordable housing provides exceptional circumstances for Green Belt release.
- 4.71 The exceptional circumstances cases for individual allocations are discussed in Section 5.
- 4.72 As stated above, concerns regarding the deliverability of a significant number of homes within the Council's trajectory means that exceptional circumstances would remain for further release of Green Belt in sustainable locations to increase the range of sites available.

- 4.73 Given that the current GB1 policy would set a Green Belt boundary incapable of meeting the need for housing, for the reasons explained above, it cannot be considered to be positively prepared.
- 4.74 As stated in reference to DEV1, the Council's assumptions that underpin the housing need and supply beyond the Plan period are not adequately justified and it is likely that additional allocations or safeguarded sites will be required to ensure that paragraph 140 of the NPPF is met.
- 4.75 The adjusted boundaries of the Green Belt as currently proposed on the WLP Policies Map are therefore unsound because they are not positively prepared and do not meet national policy, by allowing development needs to be met and enduring beyond the Plan period.
- 4.76 This can be rectified by ensuring that sufficient land is released from the Green Belt now in the form of allocations, or safeguarded land, to ensure that these needs are met.
- 4.77 In terms of provision 11 of Policy GB1, which relates to compensatory improvements, the Policy is currently unclear and ambiguous as to which developments will have to provide these improvements to the remaining Green Belt.
- 4.78 It is assumed that this would only relate to development on land that has been released from the Green Belt through this Plan, in accordance with paragraph 142 of the NPPF. The policy should be rewritten as proposed above to make it explicit that this provision only relates to development that is coming forward on former Green Belt land, and not all development proposals.

Policy INF1 – Sustainable Travel and Transport

INF1 – Sustainable Travel and Transport		
Para 35 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	Currently inconsistent with paragraph 111 of the NPPF.
Amendments Required		
Part 1.g) of the policy changes to the following:		

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

- 4.79 The current wording of part 1.g) of Policy INV1 is not aligned with the NPPF and thus as currently worded would be unsound owing to a conflict with national policy.
- 4.80 Paragraph 111 of the NPPF is clear that development should only be prevented or refused on highways grounds if the residual cumulative impacts on the road network would be severe.
- 4.81 The current wording of the policy implies that *any* adverse impact on the local community owing to an increase in traffic would not be acceptable. This is contrary to the NPPF.
- 4.82 The wording should therefore be amended to that suggested above.

Policy ENV2 – Flood Risk and Water Management

ENV2 – Flood Risk and Water Management		
Para 35 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	Currently inconsistent with paragraph 16 of the NPPF.
Amendments Required		
Remove repetition between provisions 10, 11, 12 and 13 of the policy and replace with a single paragraph instructing that development should follow the drainage hierarchy.		

- 4.83 The general principles of the policy are in general accordance with Section 14 of the NPPF and, therefore, are sound.
- 4.84 However, there are elements of the policy that need further clarification and refinement to ensure that they meet the requirements of paragraph 16 of the NPPF.
- 4.85 Points 10, 11, 12 and 13 all serve to require developments to use SuDS wherever possible and to follow the drainage hierarchy set out in the PPG (Paragraph: 080

Reference ID: 7-080-20150323). This is an unnecessary level of repetition and it is considered that these paragraphs can be merged and simplified to aid clarity.

Policy ENV7 – Renewable Energy and Low Carbon Energy Development

ENV7 – Renewable Energy and Low Carbon Energy Development		
Para 35 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	Yes	
Effective	Yes	
Consistent with National Policy	No	Represents unnecessary duplication of matters covered by building regulations.
Amendments Required		
Remove sections of the policy requiring reductions to carbon emissions beyond Building Regulation (Part L) requirements because this is already covered by the new Building Regulations that will be in place by the time the WLP is adopted.		

- 4.86 Policy ENV7(4.) states that major development in all locations outside of the strategic allocations will be required to meet at least 10% of their energy needs from renewable and / or other low carbon energy sources or to reduce their carbon emissions by at least 10% when measured against Building Regulation (Part L) requirements.
- 4.87 Part 5. of the Policy states Strategic allocations should seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems.
- 4.88 Changes to building regulations implemented from 2021 will require a 31% reduction from current requirements. Furthermore, The Future Homes Standard will require a 75% reduction from 2025.
- 4.89 The inclusion of a requirement as policy is therefore superfluous and goes against the Government's intention that energy efficiency standards should be set through Building Regulations.
- 4.90 This will ensure standardisation across the country and the ability for markets of scale to develop in terms of carbon cutting technologies that can be applied more efficiently. Applying bespoke planning policies that vary by area will not achieve this.

- 4.91 Heat networks are one option when looking to lower carbon emissions when generating heat. As existing technologies become more affordable, such as air source heat pumps, and new technologies are developed, better options may become available to lower the carbon requirement of heating more quickly.
- 4.92 The rigid wording of the policy in relation to decentralised energy networks currently prohibits the uptake of newer technologies and should be revisited.
- 4.93 It should also be noted that as the national grid continues to decarbonise, the need to decentralise networks to ensure use of renewable energy will be lessened.

5.0 REPRESENTATIONS ON SITE ALLOCATIONS

- 5.1 As previously stated, Miller agrees that the general spatial strategy adopted in the WLP is sound. However, a number of Site Allocations in the outlying settlements cannot be considered sound.
- 5.2 These are discussed individually below.

Policy OS6 – Land to the north of Winwick

OS6 – Land to the north of Winwick		
Para 35 Test	Sound?	Summary
Positively Prepared	Yes	
Justified	No	The allocation is based on inaccurate evidence within the Green Belt Assessment 2016.
Effective	Yes	
Consistent with National Policy	Yes	
Amendments Required		
Amend Policy OS6 to allocate Hollins Lane, Winwick.		

- 5.3 Part of the rationale of the selection of Site OS6 is stated at paragraph 10.11.14 of the WLP to be that it only makes a moderate contribution to the Green Belt. In addition to this, it is stated to perform well in terms of an assessment against the objectives of the Local Plan, the requirements of the NPPF, and the WLP Sustainability Appraisal.
- 5.4 The complete Green Belt evidence to inform the WLP is yet to be made available and so the most up to date assessment of the site in terms of its performance against the 5 Green Belt purposes is in the Green Belt Assessment 2016. The findings are summarised in the Green Belt Site Selection - Implications of Green Belt Release Paper, dated August 2021.
- 5.5 The Green Belt Assessment 2016 states the following with regards to the parcel (W17) within which OS6 falls. By means of contrast we have also included the assessment of Miller's site at Hollins Lane, Winwick.

Site	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Overall
OS6 (W16)	No Contribution	Moderate	Strong	No Contribution	Moderate	Moderate
Hollins Lane, Winwick (W13)	No Contribution	Weak	Strong	No Contribution	Moderate	Strong

- 5.6 There is clearly an inconsistency with regards to the assessment of each of these parcels. The only difference between them is that Hollins Lane performs weakly against Purpose 2, whereas OS6 performs moderately. Confusingly, however, the overall conclusion is the Hollins Lane has a strong performance against the purposes of the Green Belt, and OS6 has a moderate one.
- 5.7 The justification for the assessment for Hollins Lane, Winwick states that the strong performance is owing to *"not all of the boundaries between the parcel and the countryside are durable and therefore the parcel has a strong role in preventing encroachment into the open countryside"*.
- 5.8 In contrast the justification of OS6 also concludes that the parcel supports a strong degree of openness and the boundaries between the parcel and the settlement are non-durable. However, it is stated that while the parcel is very well connected to the countryside, there are durable boundaries between the parcel and the countryside. This appears to be a contradiction in terms.
- 5.9 Provision 12 of Policy OS6 specifically states that the northern boundary of the allocation will need to be strengthened to reinforce the Green Belt boundary. This would seem to contradict the conclusions of the Green Belt Assessment that there are durable boundaries present.
- 5.10 Where Miller's Hollins Lane site is concerned one boundary would also need reinforcement, however this is no different to the situation at OS6 and therefore the difference in assessment is not understood.
- 5.11 Given that OS6 performs better against more purposes of the Green Belt, and both require a single reinforced boundary, it is considered that Hollins Lane, Winwick is better suited for release from the Green Belt.

- 5.12 It should be noted at this point that the inaccurate representation of Hollins Lane, Winwick in terms of Green Belt performance appears to have stopped it being considered as an alternative site within other evidence documents such as Development Options and Site Assessment Technical Report (March 2019). Therefore, the land was not the subject of detailed assessment in the site identification process.
- 5.13 This is reinforced by the fact that the Hollins Lane site performs equally well against the provisions of the spatial strategy as set out in the WLP and relevant provisions of the NPPF.
- 5.14 The Development Options and Site Assessment Technical Report 2019, appears to have been the last evidence base document that provides specific justification for the allocation of OS6. This notes the presence of electricity pylons that run over the site, but concludes that this is acceptable because the capacity of the land is higher than the requirement for housing in Winwick.
- 5.15 This approach will result in the release of more land than is necessary from the Green Belt in this location, thus undermining the exceptional circumstances case for release. A site that is free of such constraints and would therefore make a more efficient use of land should be preferred in Green Belt release terms. One example of this is the Miller land at Hollins Lane, Winwick.
- 5.16 It is noted that the Hollins Lane site was not assessed as a potential alternative within the Sustainability Appraisal. Given that it performed better than the proposed allocation in terms of Green Belt purposes, this is an oversight and the basis for the allocation is not robust.
- 5.17 It is for the Council to undertake the Sustainability Assessment on the Hollins Lane site. However, it is highly likely to perform at the same level as OS6 based on the criteria of the Sustainability Appraisal. However, Hollins Lane performs less well against the Green Belt purposes, and it does not have any known physical constraints that would impact delivery. As such, Hollins Lane, Winwick is a preferable site for allocation based on the evidence available.
- 5.18 The NPPF requires that for plans to be justified they should be based on proportionate evidence. A key element of evidence being considered proportionate is its accuracy. The evidence underpinning the allocation of OS6 is not accurate, nor is it consistently applied; therefore the policy is unsound.

- 5.19 OS6 should be amended to allocate Hollins Lane, Winwick as the evidence available shows that it is a better option for Green Belt release. As the site is free of significant constraints and does not require significant infrastructure in order to facilitate delivery, it is anticipated that delivery would follow a similar trajectory to the current allocation.

General Points of Site Allocations

- 5.20 As stated in Section 4, the WLP should allocate more land for development in order to compensate for uncertainty associated with the delivery of identified SHLAA sites, principally in the Town Centre.
- 5.21 Furthermore, additional allocations, or the provision of safeguarded land, in the current Green Belt is required in order to ensure that boundaries endure beyond the Plan period, as required by national policy.
- 5.22 Land under the control of Miller at Croft, Hatton Lane, Stretton, Lymm and Winwick has the potential to provide circa 940 new homes, including affordable housing in sustainable locations. These sites are available and deliverable, as demonstrated in the submissions appended to these representations.
- 5.23 The key advantages, aside from the provision of much needed homes in appropriate locations are summarised below in relation to each of the mentioned sites.

Smithy Brow, Croft

- 5.24 Aside from the delivery of circa 90 homes in a sustainable location, the Indicative Development Framework shows that the site can deliver a village shop.
- 5.25 This would be a significant community asset for the village which currently does not have this facility. It would result in fewer trips to be made to other settlements for day-to-day essential items.
- 5.26 In addition to this the site provides generous public open space and a play area, which would be accessible to the wider community.
- 5.27 The site is free of any significant constraints and is not dependant on the provision of significant new infrastructure to facilitate it. As such, it is anticipated that it would deliver the full 90 homes within 5 years of the adoption of the WLP.

Hatton Lane, Stretton

- 5.28 The latest Indicative Development Framework demonstrates that the site can deliver a link road from London Road to the east to Hatton Lane to the north. This would act as a further bypass to the Cat and Lion junction, thus aiding traffic flow in this area.
- 5.29 In addition to this, the site has the capacity to provide circa 550 homes in proximity to junctions to the M56 and existing and proposed employment sites at South East Warrington. The site therefore offers the potential to form a logical and sustainable extension to the Warrington urban area in the future, which justifies the safeguarding of the site in the WLP.

Cherry Lane, Lymm

- 5.30 The site is well located to access the significant existing and new proposed employment provision at South East Warrington, without needing to go through the centre of Lymm. The site would also be able to access the key M6 / M56 interchange without needing to enter Lymm.
- 5.31 In addition to this, the site represents the opportunity to deliver circa 200 homes alongside a community hub containing a community hall and / or GP surgery if required.
- 5.32 The site identified clearly represents excellent options for the Council to consider to improve the housing land supply situation during and beyond the plan period. There is no significant infrastructure required to support the delivery of homes in this location. As such it is anticipated that a significant part of the 200 homes could be delivered within the first 5 years of the plan period.
- 5.33 Miller would welcome the opportunity to discuss with the Council in due course how its land interests could fill what appears to be a void in the supply of market and affordable housing over the Plan period and beyond.
- 5.34 It is reiterated that this is not an indication that the overall spatial strategy is unsound and elements that are unsound can be resolved by the addition of allocations and / or safeguarded land to address specific deficiencies.

6.0 SUMMARY AND CONCLUSION

- 6.1 These representations have been produced by Barton Willmore on behalf of Miller Homes in response to the Warrington Updated Proposed Submission Version Local Plan 2021-2038 consultation.
- 6.2 Miller has a number of interests in the Borough and is a key partner in terms of the delivery of much needed housing through the Local Plan in relation to the SEWUE. Comments within these representations are made in the spirit of cooperation towards the goal of meeting the development needs of the Borough through the Local Plan process.
- 6.3 The representations have identified a number of technical issues of soundness in relation to strategic and development management planning policies and these should be addressed. However, the general strategy of the Local Plan is sound and supported, and we draw attention to the separate representations and accompanying information prepared jointly with Homes England which demonstrate Miller's support for the wider Plan's strategy and for delivery of the SEWUE.
- 6.4 In addition to this, it has been found that the Local Plan should make additional allocations, and or safeguard land, in Warrington and the outlying settlements.
- 6.5 Miller Homes' land interests in the Borough, beyond the SEWUE, have the potential to deliver circa 940 homes on sites that can come forward immediately, or beyond the Plan period as safeguarded land, subject to their release from the Green Belt and achieving relevant planning consents.

**APPENDIX 1:
HATTON LANE, STRETTON REPRESENTATIONS – JUNE 2019**



Land South of Hatton Lane, Stretton

Warrington Local Plan Review
Proposed Submission Version: Regulation 19 Consultation
Iceni Projects on behalf of Wallace Land Investments

June 2019

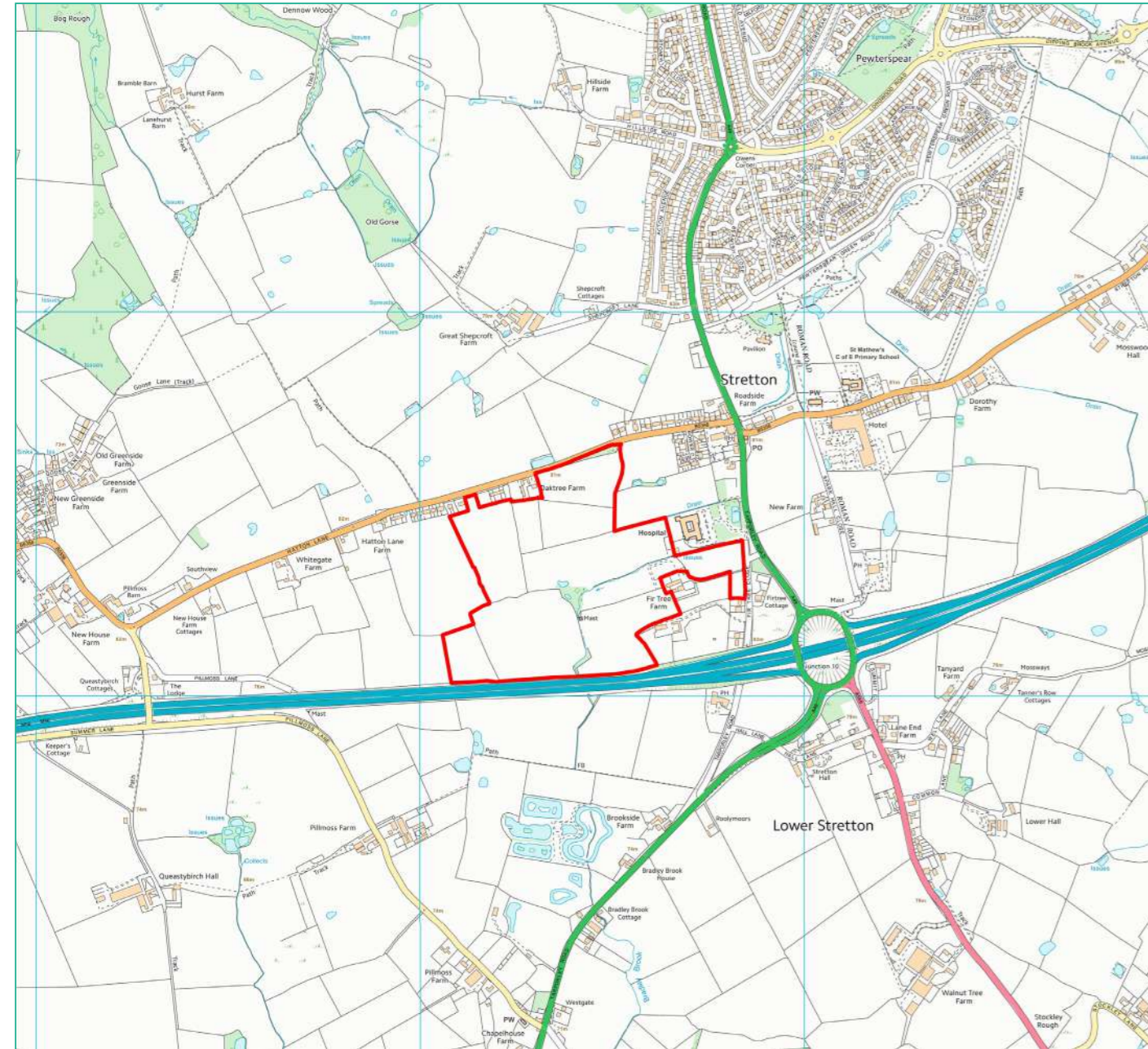


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- 6. Introduction
- 8. Development Vision
- 16. Conclusion



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Site boundary

Figure 1. Site Location Plan



Site boundary

Figure 2. Aerial Site Location Plan

Introduction

1.0 Wallace controls 27ha (66.6 acres) of land around the suburb of Stretton, to the south of Warrington. The site is located immediately off Junction 10 of the M56, to the west of the A49 and referred to in this submission as Land South of Hatton Lane.

1.1 The site has been submitted as part of the SHLAA process. Land that has been submitted within the proximity of Land South of Hatton Lane, Stretton includes a small parcel of land adjacent to M56, Stretton **reference R18/002** and land to the north of Hatton Lane identified as **R18/09, R18/10, and R18/153**.

1.2 Wallace has previously identified that the site presents a strategic development opportunity to accommodate the development of between 400-510 new homes, up to 30% affordable. The site was presented to the Council as an effective and sustainable development opportunity in previous representations, submitted at the Call for Sites (November 2015) Issues and Options (December 2016) and Preferred Development Options (PDO)(September 2017) stages.

2. NEED FOR SAFEGUARDED LAND TO SUPPORT THE COUNCILS DEVELOPMENT STRATEGY

2.1 Wallace has submitted representations about the Council’s assessment of its Housing Land Requirement; the implications of its development strategy in terms of delivering the scale of completions from sources of land supply as indicated in its Housing Trajectory and the implications and risk that the Local Plan will not deliver a 5 year effective housing land supply at its date of adoption. Wallace has made recommendations to address these concerns by adopting the following:

- Setting the housing requirement of 22,680 homes as an absolute minimum;
- Acknowledging that the Council’s regeneration projections such as Warrington Waterfront may take longer to deliver the level of completions assumed in the Council’s Housing Trajectory;
- Increasing the flexibility allowance from 10% to 20% to add 1,890 additional homes to be released from land in the Green Belt;
- Recommending that 40% (750 homes) should distributed to the outlying villages with the remaining 1,140 homes released through a review of phasing in South Warrington Garden Suburb; and
- Designating land to be safeguarded to avoid a requirement to review the Green Belt boundaries to release more land within the Local Plan period if the Council cannot maintain a 5year effective housing land supply.

2.2 In this representation Wallace considers that further land should be safeguarded

in accordance with the NPPF, to build in necessary flexibility to accommodate the Council’s growth strategy without the need for further Green Belt reviews.

2.3 During the PDO Regulation 18 Consultation Wallace supported the Council’s intention and provision of safeguarded land within the Local Plan in line with the NPPF18 which states in paragraph 139:

When defining Green Belt boundaries, plans should:

- ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;**
- not include land which it is unnecessary to keep permanently open;**
- where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;**
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;**
- be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and**
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.**

2.4 In the PDO document the Council concluded that the provision of 15 year supply of land would appear to conform to the requirements of NPPF (2012, para 157). Wallace proposed at that stage that a 20-year time horizon would be a more appropriate timescale. Such a time horizon would ensure proper plan making for the future and provide a framework for robustly managing, shaping, and the protecting the Green Belt beyond the plan period. It will also provide certainty to the development industry and local communities of the likely growth locations beyond the end of the plan period.

2.5 In this Regulation 19 Consultation on the Submission Version of the Local Plan, Wallace questions the Council’s decision to remove all references to providing safeguarded land.

2.6 Wallace recommends that actual housing need in Warrington should be higher than 18,900 homes over the plan period. Indeed, the Council identified a higher level of housing requirement in the Regulation 18 consultation on the Plan. Wallace has set

out its case for an increase in the flexibility allowance from 10% to 20% (set out in the General representations made by Wallace). In line with this case, Wallace has set out a revised land requirement over the Plan Period, as shown in the below table.

	Council	Wallace
Annual Target	945	945
2017 to 2037	18,900	18,900
Flexibility	@10% 1,890	@20% 3,780
Total Requirement	20,790	22,680
Urban Capacity	13,726	13,726
Green Belt Requirement	7,064	8,954

2.7 In summary, if the case for greater flexibility (20% rather than 10%) is accepted then the Council is only able to demonstrate a maximum of 4.24 years’ supply at the point of adoption of the Local Plan. Wallace considers that a detailed site-by-site assessment into site effectiveness will highlight that scale and rate of completions from the Urban Capacity sites would diminish.

2.8 In order to remedy a potential shortfall in its effective housing land supply over the plan period the Council’s development strategy needs to be modified as follows:

- allocate other sites in the Green Belt such as small and medium sized sites in and around existing settlements which are capable of delivering housing completions in the short-term. Wallace proposes that a further 750 homes should be allocated proportionally in the 6 outlying settlements; and
- reconsider the phasing of sites within the Garden Suburb so that more completions can be delivered during the Local Plan’s first five year period. These sites would not be reliant on the delivery of infrastructure on other sites within the Garden Suburb. Wallace recommends that up to 1,140 completions should be identified through a revised phasing programme.

2.9 Wallace considers that there is a real threat that the Council’s development strategy in terms of the scale of completions proposed in the Housing Trajectory will not deliver a 5 year effective housing land supply throughout the period of the Local Plan. Consequently, a further review of the Local Plan will be required in accord with Policy DEV1 – Housing Delivery.

“ Should monitoring indicate that a 5- year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan.”

2.10 The NPPF is clear about the need to maintain a supply of land for housing and this includes land to meet longer term development needs stretching “...well beyond the plan period...” and that local authorities should satisfy themselves that Green Belt boundaries “...will not need to be altered at the end of the development plan period...”.

2.11 In accord with NPPF, Wallace proposes that in order to satisfy this requirement, further land should be safeguarded to help provide robust long-term Green Belt inner boundaries providing certainty for local communities and for developers, clearly demarcating locations for future development during the plan period.

2.12 As an example, Wallace considers that sites such as its Land to the South of Hatton Lane, Stretton is the type of opportunity to be considered. This site provides the logical extension in the longer term to extend the South Warrington Garden Suburb given its strategic location at Junction 10. Its release for development in the future is not dependent on infrastructure delivered within the Garden Suburb. Wallace recommends that reference to safeguarded land should be placed back into the Local Plan, and that triggers should be provided which would indicate when safeguarded land would be considered for release.

2.13 This trigger should follow the Housing Delivery Test (HDT) introduced in the NPPF 2018. This requires action to be taken if delivery falls below 95% of the Council’s annual housing requirement¹. The release of safeguarded land could then be linked to this trigger if the Local Plan does not meet its annual housing requirement. In this circumstance, the Council should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Furthermore, where the HDT indicates that the delivery of housing is below 85% over the last three years, a flexibility of 20% should be added to the five-year housing land supply requirement of the authority.

2.14 In this context, the provision of safeguarded land provides the Council with greater certainty in meeting its annual housing land requirement throughout the plan period. This can be brought forward at the appropriate time through an update of the Plan as set out in paragraph 139 of the NPPF.

...make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

¹ It is noted that the HDT 2018 has Warrington at 55%.

Development Vision

3. GREEN BELT ALLOCATION

3.1 The site is currently located within Warrington Green Belt, established in 2006. The Green Belt Study (October 2016) assessed the functionality of Warrington’s Green Belt. It defined large areas into 24 different character areas and assessed them in accordance with the five functions of the Green Belt, namely:

1. To check the unrestricted sprawl of large built up areas;
2. To prevent neighbouring towns from merging into one another;
3. To assist in safeguarding the countryside;
4. Preserving 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.

3.2 It distinguished Green Belt functionality into four categories:

- No contribution;
- Weak contribution;
- Moderate contribution; and
- Strong contribution.

3.3 In the Regulation 18 Consultation, Land South of Hatton Lane, Stretton was identified within General Assessment Character Area 13, assessed as serving a strong contribution to Green Belt purposes. Wallace has however questioned the validity of this assessment, given the characteristics of the Green Belt in this locality.

3.4 General Assessment Character Area 13 was assessed as having a strong contribution in respect of Purpose 1 and 3; weak contribution to Purpose 2; no contribution to Purpose 4 and a moderate contribution to Purpose 5.

3.5 Wallace highlighted that at the individual site level, functionality will differ significantly between land parcels within the General Assessment area as a whole.

3.6 As part of the second stage in the process, the Green Belt Assessment (October 2016) then went on to assess individual parcels within the defined character areas. Land south of Hatton Lane, Stretton **was not assessed** as part of this process. The Green Belt Addendum (July 2017) assessed all sites that had been submitted as part of the Call for Sites Process 2016. However, Land South of Hatton Lane, Stretton was not submitted at these Stages, and remains un-assessed by the Council.

3.7 Whilst Land South of Hatton Lane, Stretton has not been assessed, it is apparent that land adjoining its boundary has been. Site **Reference WR49** was assessed as providing an overall **weak contribution to Green Belt purposes** and was scored weak on Purposes 1,2,3,4 and moderate when assessing Purpose 5. Furthermore, the Green Belt Report Addendum (July 2017) assessed Site **Reference R18/02** as providing an **overall weak contribution** to the purposes Green Belt.

3.8 In the Regulation 18 Consultation, Wallace invited the Council to undertake the Green Belt assessment of the site – Land South of Hatton Lane and conclude whether Land South of Hatton Lane, Stretton serves a weak contribution to Green Belt purposes. This would accord its conclusions on the Green Belt relating to Sites WR49 and R18/02. This whole site appraisal was not carried out by the Council.

3.9 In responding to this Regulation 19 Consultation, Wallace invites the Council to reconsider the site’s contribution in the Green Belt. If it is concluded that the site makes a weak contribution to the Green Belt, the Council should remove the site from the Green Belt, identifying the new boundary for the Green Belt.

3.10 Wallace submits that the site should be considered as a safeguarded site in the Warrington Local Plan. A vision for the site is detailed below, demonstrating how the land could be sensitively developed. Wallace recommends against the site being promoted as part of the Garden Suburb as it’s a standalone proposal able to deliver its own infrastructure requirements. The safeguarding is in addition to the Garden Suburb.

3.11 The site presents a strategic development opportunity to accommodate a potential developable area of 16.04 ha (39.63 acres), capable of accommodating between 400 – 510 new homes, up to 30% of which will be affordable.

3.12 Vehicular access to the site will be provided from Tarporley Road (A49) to the east and from Hatton Lane (B5356) to the north. Pedestrian and cycle access can also be provided onto Tarporley Road (A49) and Hatton Lane with an easily accessible and safe network of paths and public rights of way.

3.13 The provision of a distributor road through the site from these access points will improve the local highway network by limiting usages of the A49 / Stretton Road/Hatton Road signalised junction. It effectively delivers a local by-pass around Stretton on the west and provides through traffic relief. This has the major benefit of providing enhanced amenity and environmental benefits for existing residents within Stretton. Public transport will also benefit from access to this distributor road. The distributor road will have a series of residential areas along it and will be divided by tree belts and open spaces, helping to create interest and character along this route.

3.14 The movement hierarchy around the site will provide safe and convenient access for pedestrians and cyclists. This is achieved through a combination of shared surface lanes and a remote path network.

3.15 The site has the potential to accommodate 2, 3, 4- and 5-bedroom market houses and affordable housing. All homes will be accessible within a safe environment. The proposal is designed to integrate with the existing village of Stretton. An area of open space to the north west of the site provides a gateway entrance to the existing village, setting to the historic core of the village and ensures that the proposal forms a natural extension to the existing community.

3.16 Open space and play space provision is located throughout the proposal and will be in accord with Council requirements.

3.17 Structure planting will be provided along the southern and western boundaries of the site, providing a new and defensible inner boundary for the Green Belt. The structure planting will provide visual screening from the motorway and an attractive edge to the development.

3.18 The structure planting will incorporate rural paths around the edge of the proposal, with regular links into the proposal and easy access opportunities to the surrounding countryside. The structure planting around the site will also help promote biodiversity and form a key element in the establishment of new wildlife habitats and corridors in the area.

3.19 This proposal will provide improved local access and affordable homes, but not at the expense of the area’s character.

4. SUSTAINABILITY | SITE LOCATION

4.1 The site is located to the west of Junction 10, M56, Stretton and benefits from nearby local amenities within Stretton and south Warrington. It also has benefit of easy access to Stockton Heath, the nearby core area for social and retail amenities.

4.2 There are two main centres of employment along the M56 at the adjacent motorway junctions. Appleton and Stretton Trading Estates is located 2 miles east of the site and Daresbury Business Park is located around 3 miles to the west.

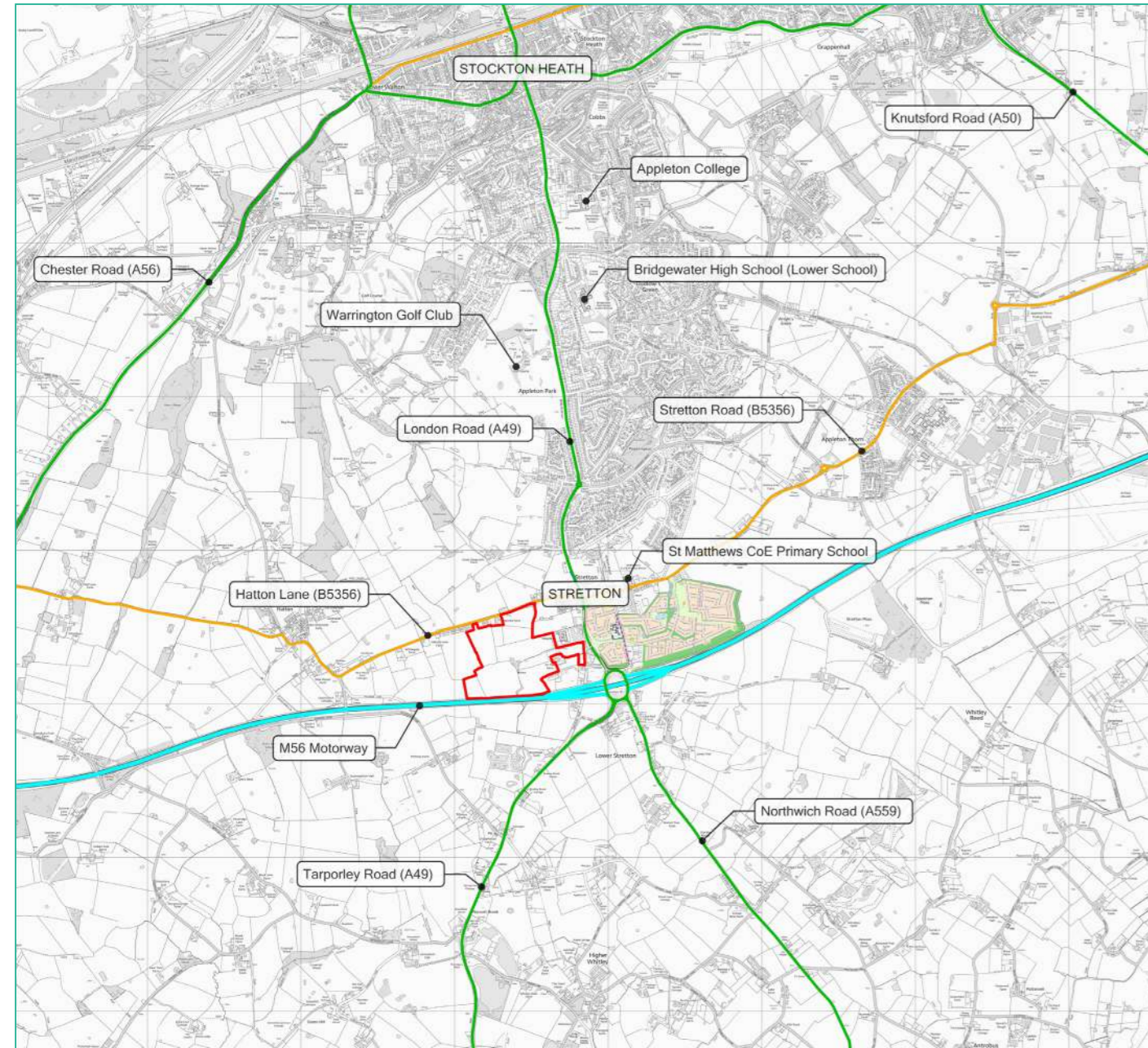
4.3 Although having motorway access, Daresbury Business Park and Appleton and Stretton Trading Estates lack integration with local settlements and consequently rely heavily on the car as a primary form of transport. The majority of cars travelling east to west rely on

the B5356/Hatton Lane and have to currently pass through the Hatton Lane/A49/Stretton Road signalised Junction.

4.4 Located directly to the east of the site is Spire Private Hospital with a Post Office, local shop, hotel and public house all located within 200m from the centre of the site. The local primary school (Stretton St Matthews) is situated approximately 1.1km to the east of the site off Stretton Road and Bridgewater High School is located 3km to the north of the site.

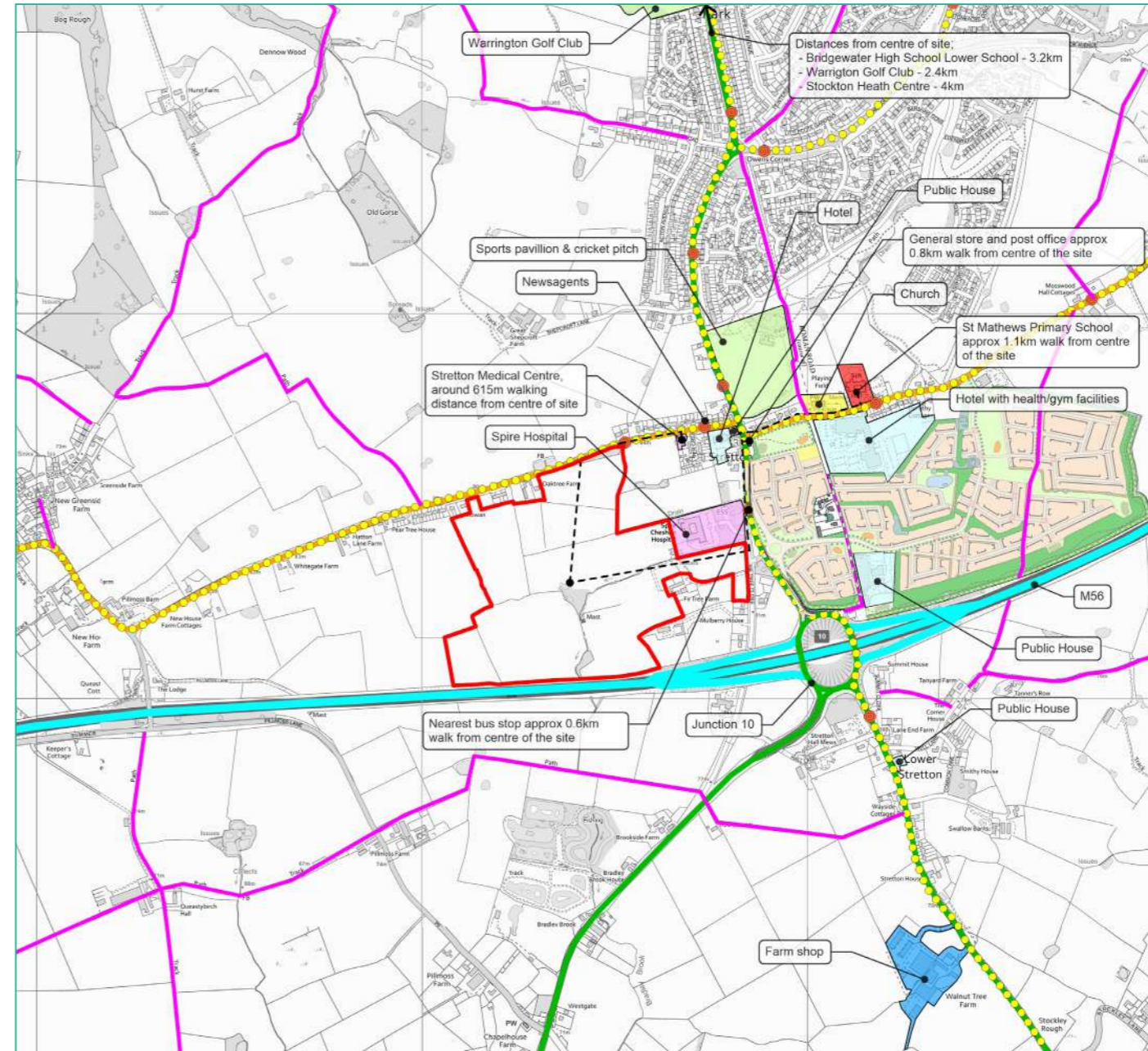
4.5 Bus services are available immediately adjacent the site on the A49 and the B5356. The nearest bus stop is located within easy walking distance, approximately 300m from the centre of the site. A number of bus services already operate around the site, including hourly services to Stockton Heath and on to Warrington.

4.6 The vision for this site provides the opportunity for more sustainable and comprehensive local highway solution by diverting traffic flows around the existing signalised A49/ Stretton Road/ Hatton Lane junction. It provides the opportunity to build new homes whilst utilising existing local amenities with direct access to public transport services. The site has access to a motorway network, allowing connections to the wider area. This is highlighted on the Strategic Site Location Plan.



- Site boundary
- Stretton 1
- Motorway
- 'A' Road
- 'B' Road

Figure 3. Sustainable Location Plan



- Site boundary
- Stretton 1
- Land use: School
- Land use: Retail
- Land use: Leisure (hotel, pub etc.)
- Land use: Place of Worship
- Land use: Health
- Land use: Outdoor sports facilities
- Motorway
- 'A' Road
- 'B' Road
- Public Right of Way
- Bus stop
- Bus route
- Walking distance from centre of site

Figure 4. Strategic Site Location Plan

Development Vision

5. SUSTAINABILITY | SCORECARD ASSESSMENT

- 5.1 As part of the background work being completed to inform Wallace’s proposal at Land South of Hatton Lane in terms of sustainability, the ‘Sustainable Development Scorecard’ has been utilised. This is a tool developed by the Sustainable Development Commission chaired by former Planning Minister Nick Raynsford. The Scorecard provides a basis to assess the extent to which development proposals have the... ‘golden thread of sustainable development’ running through them, providing a quantitative assessment of sustainable development credentials, as defined by the National Planning Policy Framework.
- 5.2 The Scorecard is intrinsically based within the context of the NPPF and its three equal pillars of environmental, economic and social sustainability. It is anticipated that by ensuring the Scorecard complements the objectives of the NPPF, planning decisions will start to become more objective, transparent and consistent.
- 5.3 The Scorecard results are broken down into two scores; an overall ‘Sustainability Score’ which assesses the total contribution from each of the three pillars, and a ‘Parity Score’ which determines how balanced the contribution is from each of the three pillars.
- 5.4 As the analysis is tuned to the site location and specific development proposals, users can be sure that the assessment is bespoke to each development in question, setting the Scorecard apart from other sustainability certification schemes.
- 5.5 When assessed, **Land South of Hatton Lane** was found to have **a total integrated sustainability score of 79%** and when broken down, its economic score is 70%, its environmental score is 86% and its social score is 81%, **producing a parity score of 85%**.

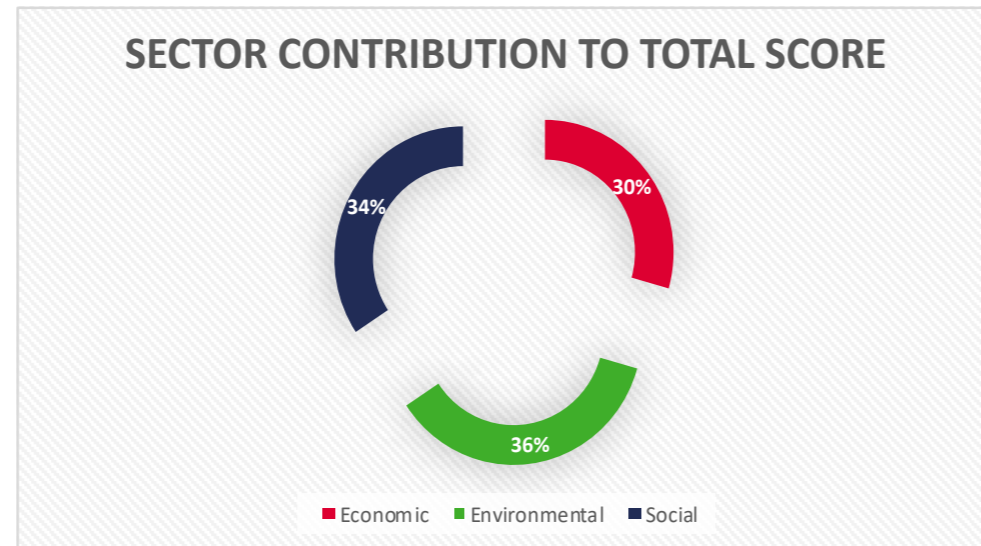
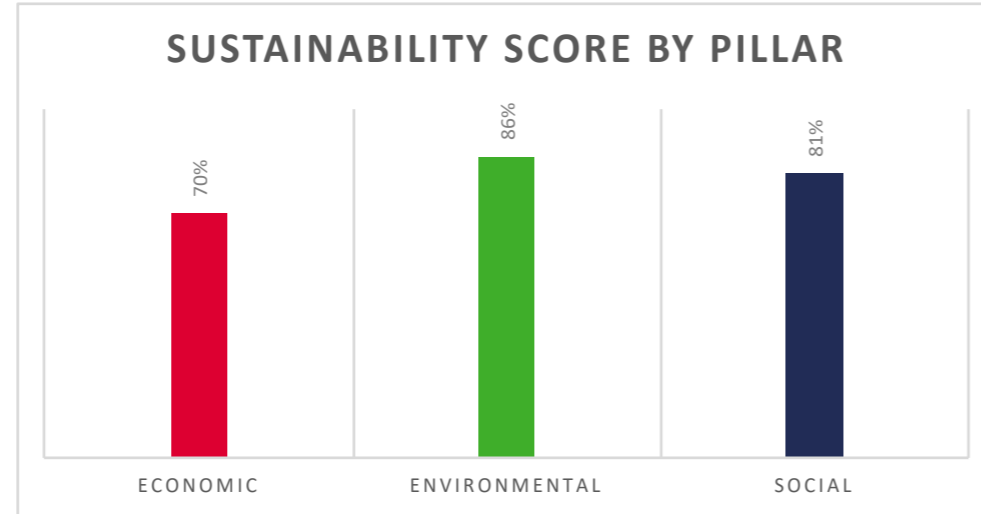


Figure 5. Sustainable Development Scorecard Results. Land South of Hatton Lane

6. COUNCIL’S SUSTAINABILITY APPRAISAL OF THIS SITE

- 6.1 As part of this response, a review of the Council’s Sustainability Appraisal in relation to Land South of Hatton Lane has been carried out.
- 6.2 The review has been conducted based on the site appraisal findings stated in Tables 6.2 to 6.4 in the Sustainability Appraisal. This scores each site against criteria deemed to be of importance for the sustainability of Warrington, depending on whether the site is considered for housing or employment.
- 6.3 The following methodology is utilised in the Council’s Sustainability Appraisal with the higher score, representing a more sustainable site. Sites considered for housing able to achieve a maximum score of 104.
- Mitigation likely to be required/unavoidable impacts – 1
 - Mitigation may be required/unavoidable impacts – 2
 - Unlikely to have a major impact on trends – 3
 - Promotes sustainable growth – 4
- 6.4 The Sustainability Appraisal score for Land South of Hatton Lane, Stretton was found to be **46/76** (it was considered as an employment site by the Council). However in conducting this review, the site is considered as a residential proposal. The revised score for Land South of Hatton Lane, Stretton is **76/104**.
- 6.5 In justifying this revised assessment, the site promotes a greater diversity of uses including amenity open space, play areas and a buffer zone to separate the site from the M56. This buffer means that housing is outside the M56 AQMA. The site is close to Stretton, the M56 and nearby employment areas, and is able to utilise local community facilities with schools and healthcare nearby.

7. PHASING

- 7.1 If Land South of Hatton Lane is safeguarded then its release for future development is dependent on the Council maintain its 5 year effective housing land supply. Only when defined triggers are reached, would a partial review of the Local Plan be required.

8. INFRASTRUCTURE | CAPACITY & REQUIREMENTS

- 8.1 Traffic impact assessment work undertaken in support of a planning application for residential development on HCA land, located to the north of Stretton Road, has confirmed

that the A49 London Road / Stretton Road / Hatton Lane signal-controlled junction (the Cat & Lion junction) is experiencing capacity constraints during the weekday peak hours.

- 8.2 The development of Land South of Hatton Lane delivers a distributor road through the site (acting as a local by-pass) which will improve the local highway network by reducing use of the A49 / Stretton Road/Hatton Lane signalised junction as it provides through traffic relief. Enhanced amenity and environmental benefits for existing residents within Stretton would also be realised.

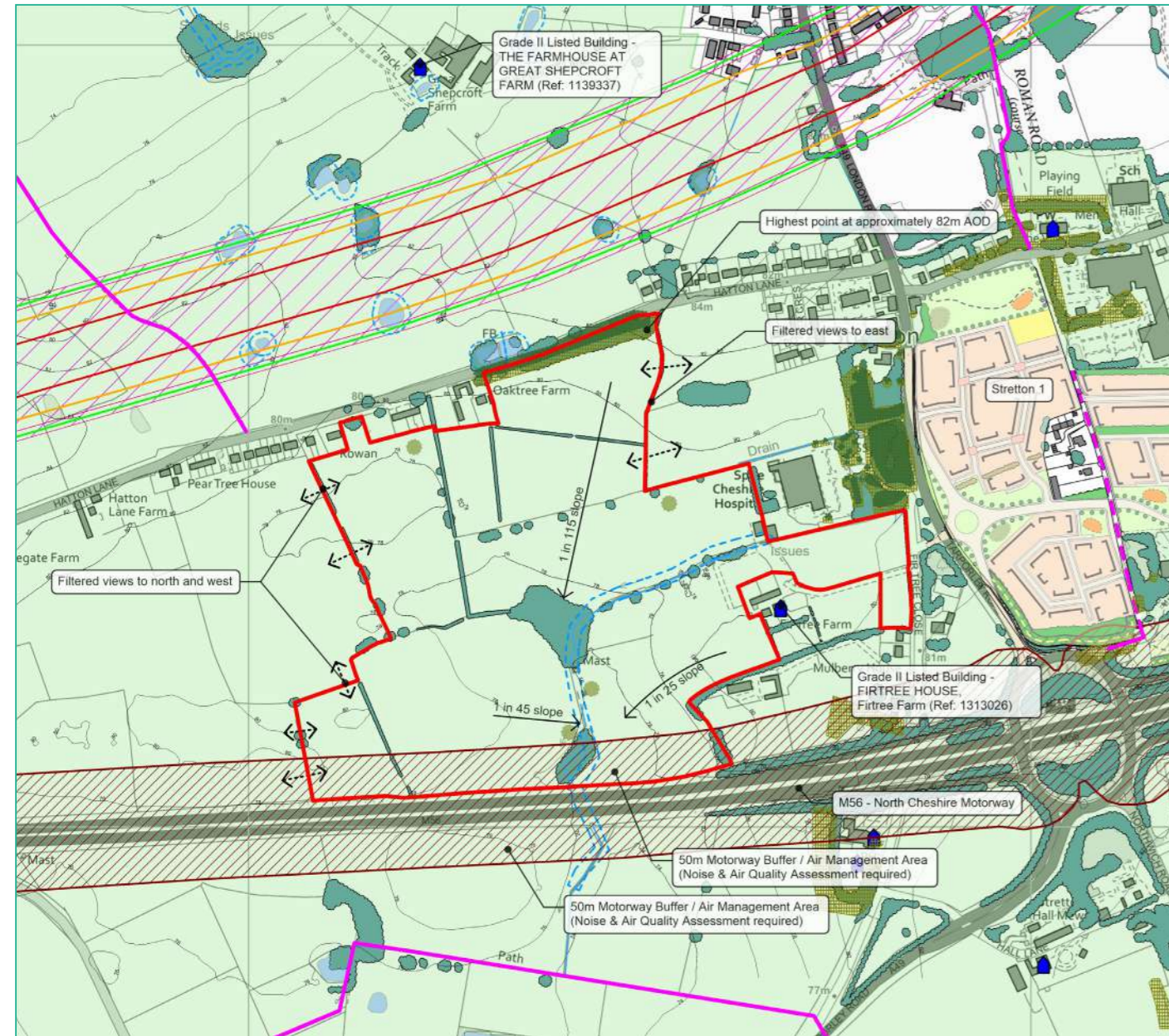


Figure 6. Site Opportunities & Constraints Plan

- Site boundary
- Stretton 1
- Green Belt
- Existing trees
- Public Right of Way
- Tree Preservation Order (TPO)
- Existing waterbody
- Environmental Agency existing waterbody 8m buffer - size to be confirmed
- 80m pipeline offset (Shell / HSE Consultation Zone)
- Pipelines Inner Zones Feb16 - housing development not permitted
- Pipelines Middle Zones Feb16 - housing development restricted
- Pipelines Outer Zones Feb16 - housing development permitted
- 50m buffer and Air Quality Management Area (AQMA) to motorway
- Grade II Listed Building
- Direction of slope
- - - - - Filtered views
- Potential location for SuDS measures size and location to be determined by engineer
- Existing contours - 2m intervals

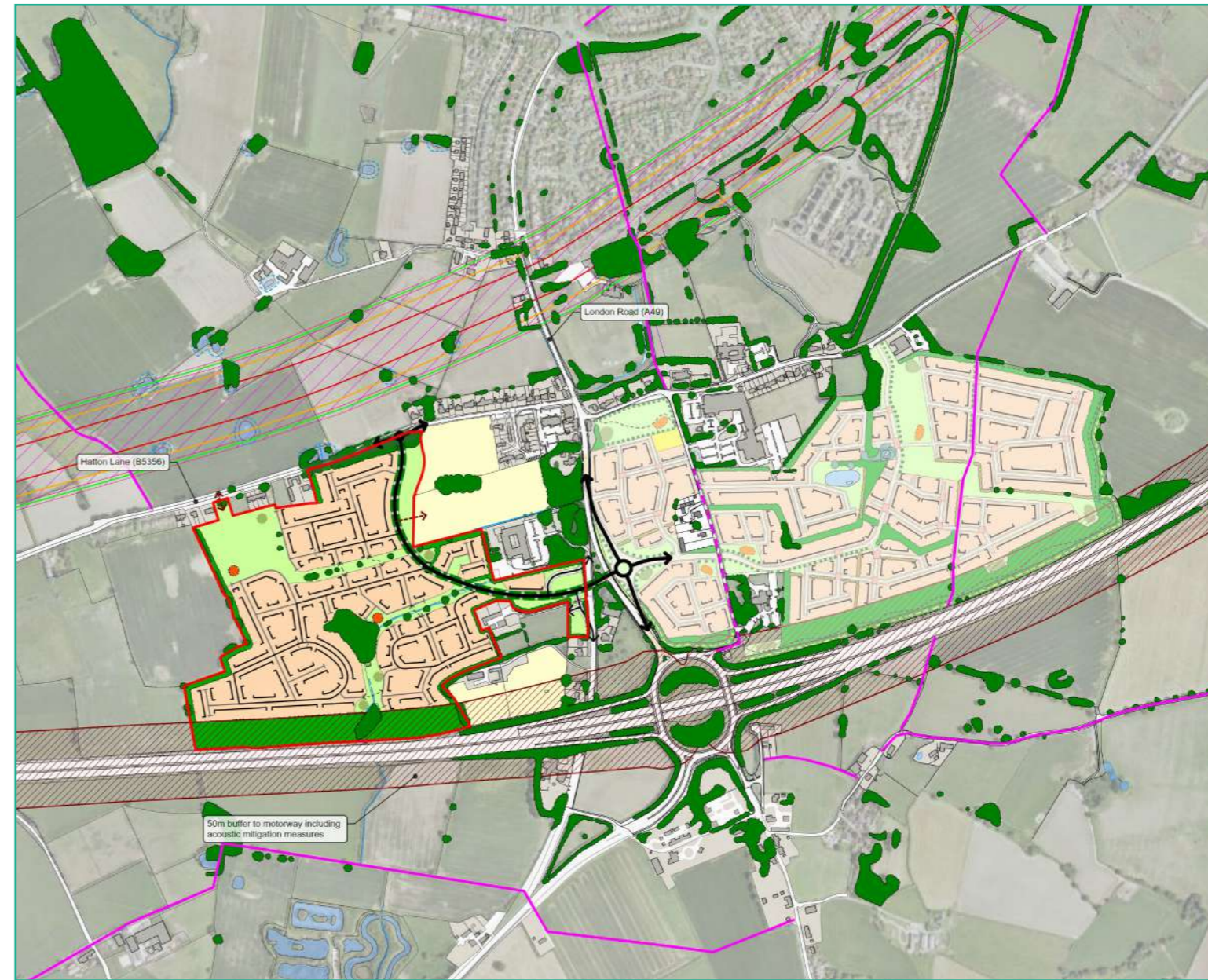


Figure 7. Indicative Development Framework

- Site boundary - 26.96 ha / 66.62 ac
- Potential developable area - 16.04 ha / 39.65 ac
- Potential future residential development - 6.11 ha / 15.09 ac
- Stretton 1
- Potential amenity open space
- Existing trees
- Potential tree planting
- Proposed tree line
- Potential location for SuDS
- Existing waterbody
- Environment Agency existing waterbody 8m buffer
- ↔ Proposed link road
- Primary street
- - - Neighbourhood street
- | Lane
- - - - - Pedestrian connection
- Primary node
- Secondary node
- Frontage
- Potential location for equipped play area
- ↔ Potential future connection
- Public Right of Way
- 50m motorway buffer
- Tree Preservation Order
- 80m pipeline offset (Shell / HSE Consultation Zone)
- Pipelines Inner Zones Feb16 - HSE 'advise against' housing development
- Pipelines Middle Zones Feb16 - HSE 'don't advise against' housing development, but subject to restrictions (see below)
- Pipelines Outer Zones Feb16 - HSE 'don't advise against' housing development (Non housing uses subject to restrictions)

Conclusion

- 9.0 Wallace is supportive of the reuse of brownfield land across Warrington. In its experience, brownfield sites prove complex to deliver and in terms of lead-in, take longer than anticipated when compared to greenfield sites. The Council's reliance on a development strategy delivering the scale of housing trajectory from brownfield sites in the early part of the Plan Period has the potential to undermine the long-term performance of the Local Plan to meet its annual housing requirements.
- 9.1 Wallace therefore recommends that the Local Plan should establish the longer-term permanence of its Green Belt boundaries by providing Safeguarded Land.
- 9.2 As such, it is recommended that the Council re-introduces its safeguarding approach, identifying the triggers it wishes to adopt to release these sites pending its ongoing effective housing land performance.
- 9.3 The Council should safeguard a number of key sites including Land South of Hatton Lane, Stretton for this purpose. The site does not contribute meaningfully to the Green Belt and is suitable for future development. Land South of Hatton Lane, Stretton provides a standalone development proposal for around 500 homes with suitable Green Belt boundaries.
- 9.4 This NPPF recommended approach will provide the necessary flexibility should completions from brownfield sites in urban areas become unavailable, unsuitable, unachievable or undeliverable.

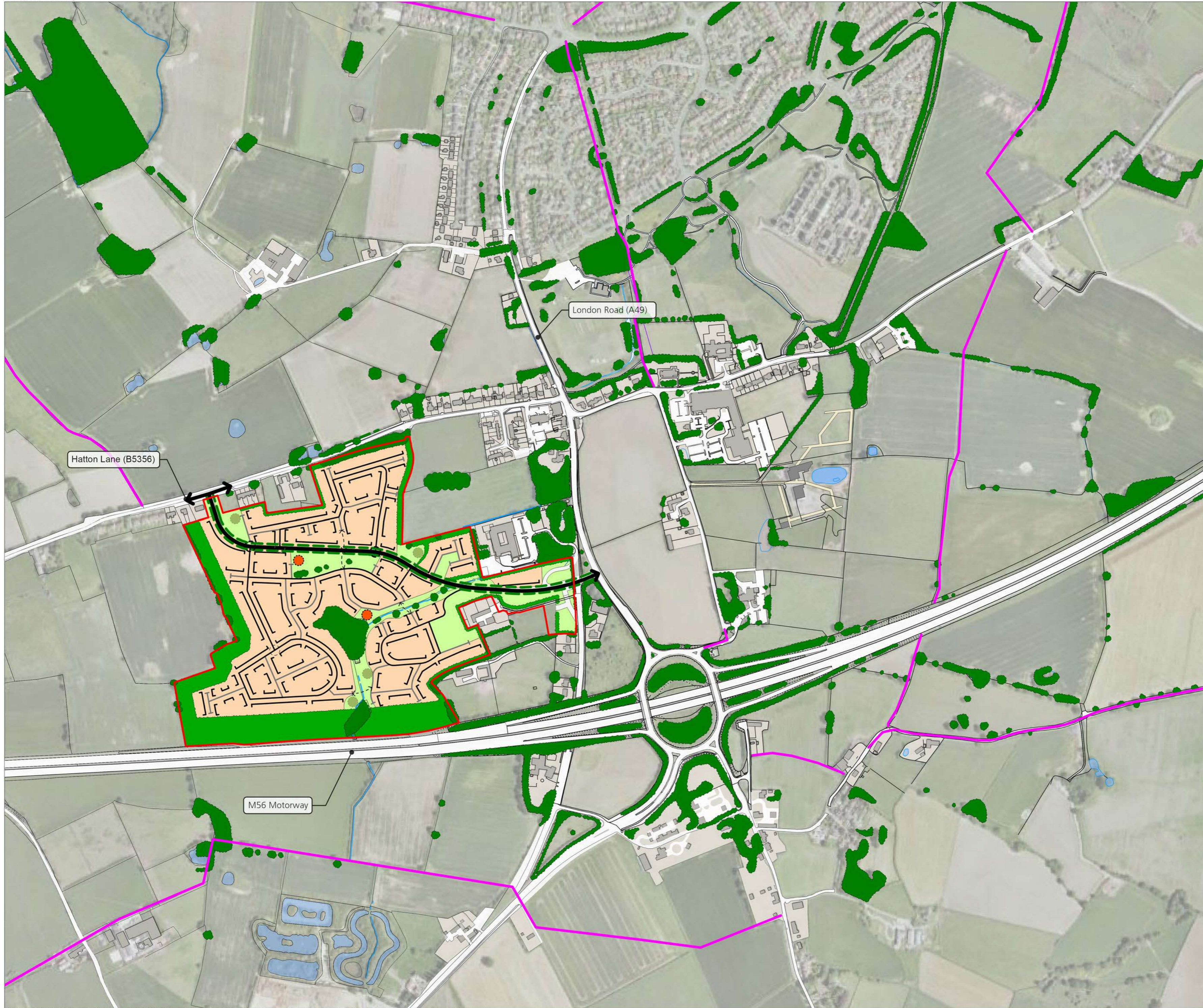
This document was prepared by IcenI Projects on behalf of Wallace Land Investments

Delivery | Design | Engagement | Heritage & Townscape
Impact Management | Planning | Sustainable Development | Transport

[Redacted text block]

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**APPENDIX 2:
HATTON LANE, STRETTON AMENDED INDICATIVE DEVELOPMENT
FRAMEWORK – REVISION H**



Land South of Hatton Lane, Stretton

Drawing No.
09012-Stretton 2-MPDF-P001-H
Indicative Development Framework

- Site boundary - 26.60 ha / 65.73 ac
- Potential developable area - 15.83 ha / 39.12 ac
- Potential amenity open space
- Existing trees
- Potential tree planting
- Proposed tree line
- Potential location for SuDS
- Existing waterbody
- Proposed link road
- Primary street
- Neighbourhood street
- Lane
- Pedestrian connection
- Primary node
- Secondary node
- Frontage
- Potential location for equipped play area
- Public Right of Way

Rev H (15.10.21) Drawn: SB Checked: KP Approved: SS
 Note: Layout amended
Rev G (10.10.21) Drawn: SB Checked: KP Approved: SS
 Note: Boundary and layout amended
Rev F (06.06.19) Drawn: KT Checked: SB Approved: KT
Rev E (23.05.19) Drawn: SB - Checked: KT Approved: KT
 Note: Stretton 1 updated

Status: For Information
 scale 1:5,000 @ A2
 0 50m 100m 250m

**APPENDIX 3:
HOLLINS LANE, WINWICK REPRESENTATIONS – JUNE 2019**

**Representation to the Warrington Proposed
Submission Version
Local Plan 2017 - 2037**

Representations on Behalf of Miller Homes

June 2019

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Appendices

Appendix 1 – Site Layout Plan

Appendix 2 – Development Plan Framework Document

Appendix 3 - Housing Supply Table

1.0 INTRODUCTION

- 1.1 This representation has been prepared by Barton Willmore on behalf of Miller Homes (our "Client") and is submitted in response to the Warrington Submission Version Local Plan ("Submission Version") consultation.
- 1.2 The Submission Version consultation provides an opportunity to comment on Warrington Borough Council's ("the Council") proposed development strategy to meet its identified development needs. Once adopted, the Local Plan will replace the Core Strategy (2014).
- 1.3 At the outset, we wish to note that whilst our Client generally welcomes the Council's approach to growth outlined within the Submission Version, they do object to the proposed spatial strategy and related policies as drafted which are considered to be unsound.
- 1.4 In preparing this representation, Barton Willmore has undertaken a thorough review of the accompanying evidence base documents published alongside the Submission Version. This review, having regard to national policy requirements and guidance, has informed the content of this representation with a particular focus on the soundness of the Council's development strategy.
- 1.5 We submit these comments with a view to ensuring that the Local Plan can ultimately be found sound, consistent with the guidance contained in the National Planning Policy Framework (NPPF).

Land at Hollins Lane, Winwick

- 1.6 Our Client has actively promoted their land interests at Hollins Lane, Winwick through the emerging Local Plan process since 2017.
- 1.7 This representation is supplemented by a site layout plan prepared by JDA Architects (**Appendix 1**); which builds on the principles established within the development framework document, prepared by Barton Willmore (**Appendix 2**) which assesses the site context and its potential to accommodate residential development informed by a considered and detailed masterplan approach. This is discussed further in Section 7 of this representation.

Soundness of Plan

1.8 To assess whether a Local Plan can be found “sound” and suitable for adoption, Paragraph 35 of the NPPF sets out that the Plan should be:

- **Positively prepared:** The Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs (where this relates to housing, such needs should be assessed using a clear and justified method) 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;
- **Justified:** The Plan should be an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence;
- **Effective:** The Plan should be deliverable over the Plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred; and
- **Consistent with national policy:** The Plan should enable the development of sustainable development in accordance with the policies in the Framework.

1.9 It is our Client’s position that the Plan as drafted together with its associated evidence base documents require a number of amendments to ensure that it is robust and to be found sound.

1.10 Our Client reserves their right to appear at the Examination Hearing Sessions in due course.

2.0 PLAN PERIOD, VISION AND OBJECTIVES

Plan Period

- 2.1 The Submission Version identifies the Plan period as covering 20 years between 2017 – 2037. This longevity of this Plan period is supported by our Client and aligns with paragraph 22 of the NPPF which identifies that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities.

Vision and Objectives

Vision

- 2.2 The Council has identified a 10-point Vision for the emerging Local Plan. Our Client is generally supportive of the proposed Vision for Warrington. The Vision is largely consistent with national policy and will help bring forward positive social and economic change.
- 2.3 That said, our Client is concerned that the main focus and message contained within the Vision is lost and that it should focus solely on Point (1) Bullet Points 1 – 4 which identify the main themes to ensure that the Vision remains sufficiently concise.
- 2.4 We would also suggest that if the Council is minded to retain the Vision as drafted, then “**to achieve this Vision**” should be inserted prior to Points (2) to (11) to identify how this will be delivered.
- 2.5 There is some overlap between Points 2 – 11, and it is unclear whether there is a need for this extent of detail to be provided within the Vision. There also appear to be substantial overlap and unnecessary repetition between the matters identified within the Vision and the Strategic Objectives.

Objectives

- 2.6 The Plan’s Strategic Objectives are identified as Objectives W1 – W6 and comprise the following:
- To enable the sustainable growth of Warrington through the ongoing regeneration of inner Warrington, delivery of strategic and local infrastructure, strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods;
 - To ensure the revised Green Belt boundaries maintain the permanence of the Green Belt in the long-term;
 - Strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub;

- To provide new infrastructure and services to support Warrington's growth, reduce congestion and more sustainable travel; and encourage active and healthy lifestyles;
- Secure high-quality design which reinforces the character and local distinctiveness of Warrington's urban area, its countryside, and its unique pattern of green spaces; and
- Minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution towards improving Warrington's air quality.

2.7 Our Client is broadly supportive of the objectives listed above as these remain largely unchanged from the previous iteration of the Plan. Due to the presentation of the Objectives following a review of the Plan requirements, it would appear that the Submission Version is self-serving and may not adequately address the actual needs of the Borough. Continued significant attention is given to the Urban Area and its sustainable development to the ongoing detriment of the outlying settlements and rural locations of the Borough. Our Client considers that the Local Plan needs to be sufficiently equipped to respond to these issues, and to secure the vitality and viability of these outlying settlements and rural areas. This recognition should be made upfront within the Objectives. These concerns were raised following the publication of the Preferred Development Option in 2017 and have still not yet been addressed.

Spatial Strategy

2.8 The Council has set out its approach to the spatial strategy to meet the needs of the Borough over the Plan period, and which involves the need for Green Belt release. This includes a new Garden Village Suburb, South West Urban Extension and incremental growth around the outlying settlements. The justification for this approach is the ability of the sites to deliver the housing needs of the Borough, providing access to employment, shopping and retail facilities. It is also considered that incremental growth within the settlements will ensure the long-term integrity of the Green Belt. The reason for discounting other options relate to infrastructure constraints to deliver; impact on the Green Belt; traffic constraints; ecological impact; and sterilisation of mineral resources.

2.9 Whilst the need for development in outlying villages is supported, we object to the continued approach taken by the Council as to how the amount of appropriate "incremental growth" for each outlying settlement has been determined. The Council's

justification for this approach is based on a 10% growth limit as set out in the Council's response to the Regulation 18 consultation, but it is not based on any substantiated evidence. The Council's justification for the 10% limit appears to be in relation to settlement size, ensuring that development is capable of being accommodated without changing the character of the respective settlement, and in a sustainable manner to ensure the viability and vitality of the settlement over the Plan period. It is not considered that the character of the outlying settlements will be harmed by this level of growth, and nor would it be if the level of housing growth were increased further.

- 2.10 The Council has also identified their case for exceptional circumstances to justify Green Belt release. It is our position that the Council's justification and reason for Green Belt release is compliant with Paragraph 137 of the NPPF and it has been demonstrated that there is insufficient capacity to meet the Borough's housing needs within the Urban Area accordingly, Green Belt release is required. This is supported by our Client.

3.0 HOUSING REQUIREMENT OVERVIEW

Strategic Planning Policy DEV1 – Housing Delivery

- 3.1 The Council has identified that between 2017 and 2037, a minimum of 18,900 new homes will be delivered to meet Warrington’s housing need and support its economic growth aspirations, which equates to 945 dpa. We set out our comments in relation to this below.

Housing Need Context

- 3.2 The Mid-Mersey Strategic Housing Market Assessment (SHMA) and subsequent updates produced for the Council by GL Hearn sets out the future housing need established within the Mid-Mersey Strategic Housing Market Area. Its subsequent updates produced by GL Hearn on behalf of the Council provide an assessment of the likely future housing needs of Warrington Borough over the Plan period 2017 to 2037.
- 3.3 In representations submitted to the 2017 Preferred Development Option, we confirmed that our Client was largely supportive of the need for a housing requirement higher than the assessed level of housing needs, with the exception of concerns in relation to market signals and economic projections.
- 3.4 Following the publication of the NPPF updates (2018 and 2019), it is noted that the Council instructed GL Hearn to prepare a Local Housing Needs Assessment (“LHNA”) utilising the standard methodology, with a re-based plan base date of 2017. This builds upon the Liverpool City Region SHELMA and has utilised the same assumptions and discusses this in the context of the standard methodology. This has been read and assessed in conjunction with the Council’s Development Options and Site Assessment Technical Report (March 2019).
- 3.5 Our Client welcome the identification of a housing requirement which is above the standard methodology requirement of 909 dpa. That said, we do have a number of comments with the approach and consider that the figure should indeed be higher than that currently set out in the Submission Version. We set out our rationale for this below.

Standard Methodology

- 3.6 The standard method housing need for Warrington is 909 dpa based on 2014 based household projections; however, it is acknowledged within the LHNA that this is only a minimum need and there may be reasons for the Council to adopt a housing requirement in excess of this.

- 3.7 The standard method has three components – starting point/baseline; market signals adjustment; and cap. The starting point is the 2014 – based household projects, which indicate a household growth of 792 households per annum. An adjustment to the demographic baseline has been added for market signals, equating to an adjustment of 14.75%, resulting in a need for 909 dpa. A ‘cap’ has not been applied because Warrington does not currently have a housing target and the market signal adjustment is less than 40%.
- 3.8 As such, because the capped figure is greater than the minimum annual local housing need figure, the minimum OAN is 909 dpa, in line with the standard methodology, which equates to the growth of 28,600 people over the period 2017 – 2037. This is based on a ‘policy off’ approach.
- 3.9 However, it is acknowledged within the LHNA that this is a minimum need and a ‘policy on’ approach which allows for a housing requirement with a greater level of jobs growth may be more appropriate.
- 3.10 A ‘policy on’ approach is supported by our Client because it will ensure that the demographic needs of the Borough are met, help to meet the affordable housing requirements, and will provide an increase in assessed demographic needs.
- 3.11 In light of the above, whilst the baseline housing need position is therefore considered to be 909 dpa, the implications of four economic scenarios on the housing requirement for Warrington were considered. These included Cambridge Econometrics; Oxford Economic Baseline Projection; Past Employment Trends; and Strategic Economic Plan and ranged from 635 to 1,240 jobs per annum, the latter of which when adjusted equates to 954 jobs per annum. The reason for the reduction within the LHNA to the SEP is due to economic activity rates. Whilst this overall figure is substantially lower than that proposed in the previous iteration of the Plan, and it is our Client’s position that a higher economic growth scenario should be pursued, our main concerns with the requirement relate to the lack of uplift applied to affordable housing need.

Housing Requirement

- 3.12 Utilising the standard method and adjustments, the housing need would equate to 909 dpa. However, on the basis that this figure would not support the anticipated level of growth required for growth in the Borough, the LHNA has indicated that a requirement of 945 dpa would allow for an adjustment to household representation in younger age groups.

- 3.13 The LHNA suggests that further uplift to address affordable housing need more promptly would be required; however, it was concluded that on the basis that not all affordable housing need would be capable of being building out, nor is the demand that high, there is no requirement to meet this need.
- 3.14 Accordingly, it is suggested within the LHNA that a requirement of 950 dpa would be appropriate. This would allow for the delivery of more affordable homes, and whilst there is no set methodology, other LPAs have utilised either 5% or 10% uplift.
- 3.15 This recommendation has not been carried forward as Policy DEV1 identifies a need for a minimum of 18,900 new homes to be delivered over the Plan period, and which equates to an average of 945 dpa and has only assessed three options. These options identified within the Options and Site Assessment Technical Report ranged from (a) 909 dpa; (b) 945 dpa; or (c) 735 dpa. Option (b) was identified as the housing requirement which best matched economic growth aspirations and reflected the Council's commitment to addressing affordability and represents a 4% over-requirement, which the Council considers is compliant with PPG given the potential for a slowdown in economic growth delivered through SEP. This in conjunction with an adjustment to household formation rates, which has in the Council's view sought to address the instances of worsening affordability.
- 3.16 On this basis, whilst the Council has confirmed why options (a) or (c) were not selected, it is unclear why the further options of (d) of 955 dpa based on a 5% uplift was not assessed or selected given that this is what was pursued in the 2017 Preferred Development Option and aligns with the recommendations set out in the LHNA; or (e) why 1,000 dpa based on a 10% uplift for affordable housing was not pursued.
- 3.17 It is our position that pursuing a minimum housing requirement of 955 dpa would ensure that it is above the standard method, boosts economic growth, and achieves the demographic, economic and affordable housing need by delivering more homes overall and increase the market and particularly housing supply in the Borough during the Plan period and beyond. This is particularly prevalent given the need for Green Belt release and would only represent a further 5% uplift to the OAN and would account for affordable housing need. As such, it is unclear why this option has not been pursued. Furthermore, a 10% uplift to an OAN of 909 dpa to account for affordable housing need would result in a housing requirement of 1,000 dpa, and would help to ensure that economic-led need, demographic, economic and affordable housing are met through the delivery of more market and affordable homes.

- 3.18 As such, whilst our Client welcomes the Council's approach in pursuing a figure significantly higher than the standard method requirement of 909 dpa, it is our view that a requirement of 945 dpa does not represent the most suitable level of housing growth and further uplift is required to ensure that the housing requirement delivers the requisite amount of housing required to achieve the demographic, economic and affordable housing needs of the Borough by delivering more homes overall.
- 3.19 Accordingly, a further uplift to a minimum of 955 dpa or 1,000 dpa would therefore be appropriate. This is to ensure that it aligns with the economic growth aspirations of Warrington, and its role within the Warrington and Cheshire LEP, and to ensure compliance with the NPPF and PPG.

Housing Distribution

- 3.20 The Council is seeking to deliver the majority of new homes within the existing main Urban Area of Warrington, the existing inset settlements, and other windfall sites within the SHLAA, with an indicative capacity of 13,726 new homes. This will be supplemented by Green Belt release and includes a Garden Suburb (6,490 homes) and the South West extension (1,631 homes). Further housing (1,085 dwellings) will also be delivered on allocated sites which are proposed to be removed from the Green Belt in Burtonwood (160 homes); Croft (75 homes); Culcheth (200 homes); Hollins Green (90 homes); Lymm (430 homes); and Winwick (130 homes).
- 3.21 Our Client has a number of concerns with the Council's identified housing supply and distribution, particularly within the Waterfront/Town Centre areas and this is discussed further in Section 4 of this representation.
- 3.22 Furthermore, our Client also has a number of concerns with the continued over-reliance on the South-West Urban Extension and Garden Suburb to meet a significant proportion of Warrington's housing needs over the Plan period up to 2037. Our concerns are summarised below and provided in more detail in Section 4 of this representation.

Garden City Suburb (Policy MD2)

- 3.23 The Garden City Suburb area of growth relates to a large area of Green Belt and non-Green Belt land extending from the south-east of the Warrington Urban Area. The area is identified as a strategic mixed-use allocation and is the largest single contributor towards the future housing needs of the Borough; it will deliver approximately 7,400 new homes, and 116 ha of employment land. Only 5,100 new homes are expected to be delivered within the Plan period. It will comprise three Garden Villages, a central neighbourhood centre, employment zone and green infrastructure network.

- 3.24 Taking into account the above, our Client does not object to the conclusion made by the Council that this area provides a suitable location in which to deliver a large number of new housing and strategic employment opportunities, and consider that it accords with paragraph 72 of the NPPF in this regard.
- 3.25 The Garden City Suburb area of growth relates well to the existing urban area and is of a scale necessary to provide the opportunity to deliver the amount of employment land needed to facilitate the continuing economic success and competitiveness of Warrington. It will deliver 116 ha of employment land, at the junction of the M6 and M56. The area is found to fulfil a weak role within the Green Belt and forms part of the original New Town Plans for Warrington which are yet to be fully realised.
- 3.26 Our Client's principal concern relates to the deliverability of this area in its entirety over the Plan period. This is discussed in Section 4 of this Statement.

South West Warrington (Policy MD3)

- 3.27 The South West Urban Extension seeks to deliver 1,600 new homes and will involve the release of circa 112 hectares from the Green Belt. Our Client does not object in principle to the release of this land on the basis that it accords with paragraph 72 of the NPPF. Our Client's principal concern relates to the deliverability of this area in its entirety over the Plan period. This is discussed in Section 4 of this Statement in terms of the proposed timescales envisaged and the assumptions proposed.

Outlying Settlements

- 3.28 The Preferred Development Option identified a need for 1,190 homes to be delivered on seven outlying settlements – Lymm (500 homes), Culcheth (300 homes), Burtonwood (150 homes), Winwick (90 homes), Croft (60 homes), Glazebury (50 homes), and Hollins Green (40 homes). 1,085 dwellings are now proposed to be delivered on allocated sites within outlying settlements, which include Burtonwood (160 homes); Croft (75 homes); Culcheth (200 homes); Hollins Green (90 homes); Lymm (430 homes); and Winwick (130 homes). Glazebury has been removed from the 2019 Submission Version on the basis that all of the sites performed well in terms of Green Belt and the requirements have all been reduced.
- 3.29 Our Client supports the principle of allocating land around the outlying settlements, and the need to boost homes within these areas. However, it is our view that the amount of housing proposed within these outlying settlements is not sufficient and further land release is required. This is on the basis that the Urban Capacity supply is insufficient to meet the Council's needs over the Plan period as evidenced in Section 4 of this

representation and that further Green Belt release is required to facilitate this requirement.

- 3.30 It also remains unclear how the growth options for each outlying settlement have been calculated or defined because it appears that “incremental growth” is the main contributing factor in each option considered by the Council. It appears to be based on a submitted site by site basis rather than examining what the needs of each settlement actually are as only a 10% incremental growth rate has been applied to each settlement.
- 3.31 It is our view that the Settlement Profiles document published as part of the 2017 consultation should be updated as part of the Local Plan evidence base to take account of the actual future housing needs for specific types of housing in each outlying settlement, even as a proportion of the future demographic needs of the Borough, particularly as it is noted that there is a requirement for large (4+ bed) houses within the Borough. A detailed review of the health of facilities and services, beyond primary, secondary education, and health care capacity is required.
- 3.32 In the outlying settlements, only an incremental growth scenario has been assessed. As a result, it is unclear whether the approach to development is the most appropriate given the needs, opportunities, capacity and constraints of the settlement. For this reason, the approach to growth in outlying settlements and Winwick in particular cannot be consistent with national planning policy and as such is considered by our Client to be unsound and an approach which they object to.

Winwick Specific

- 3.33 It is noted that Winwick has been included as a settlement within the outlying settlements hierarchy where Green Belt release is proposed. The inclusion of Winwick with this list of settlements acknowledges it is a settlement which is capable, suitable and in need of additional residential development during the Plan period.
- 3.34 The Council’s original justification for growth in Winwick is that it would support a pattern of development providing for “incremental” growth (in each identified outlying settlement) and as such a 10% growth rate would be appropriate.
- 3.35 Our Client disagrees. Whilst our Client supports the identification of Winwick as an outlying settlement, it is our view that in respect of its size and role, further housing is capable of being accommodated at the edge of the settlement through further Green Belt release and that development on more suitable sites such as our Client’s site at Hollins Lane, Winwick is appropriate.

- 3.36 This is on the basis that the amount of housing to be delivered in Winwick should be higher than 130 dwellings and should be reflective of its proximity to the Warrington Urban area and excellent road linkages.
- 3.37 It is noted that within the Council's Site Assessment Technical Report (2019) that an option was considered by the Council to develop an urban extension around Winwick in response to the number of sites being promoted. However, this was discounted due to the fragmented nature of the various sites being promoted, which may result in difficulties in terms of infrastructure delivery, impact on the character of Winwick and transport, air and noise pollution constraints. We disagree with this approach for the aforementioned reasons.
- 3.38 As such, in the case of Winwick and other outlying settlements, only an incremental growth scenario has been assessed. As a result, it is unclear whether the approach to development is the most appropriate given the needs, opportunities, capacity and constraints of the settlement. For this reason, the approach to growth in Winwick and the outlying settlements cannot be consistent with national planning policy and as such is considered by our Client to be unsound.
- 3.39 Accordingly, it is our Client's view there is a clear justification for the proposed housing growth in Winwick to be increased to support housing needs and continued service vitality and viability to provide for a sustainable pattern of development, and to ensure the deliverability of the Plan requirements through a much greater diversification of the supply to promote market choice.
- 3.40 Comments in relation to Land to the north of Winwick (Policy OS9) are provided in Section 5 of this Statement.

Housing Trajectory

- 3.41 Paragraph 73 of the NPPF identifies that strategic policies should include a housing trajectory illustrating the expected rate of housing delivery over the Plan period, and the anticipated rate of development of sufficient sites; identify and update annually a supply of specific and deliverable sites sufficient to provide a minimum of five years worth of deliverable housing land against their housing requirement set out in adopted strategic policies or against their local housing need if over 5 years old.

- 3.42 The Council is seeking to apply a stepped approach to housing delivery as set out below:
- 2017 – 2021 – 847 dpa
 - 2022 – 2037 – 978 dpa
- 3.43 It also states that if monitoring indicates that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan period can no longer be sustained, the Council will give consideration to a review or partial of the Local Plan.
- 3.44 The Council contests that it has afforded due consideration to the rate that new homes can be built on different types of sites within the overall land supply and lead in times for supporting infrastructure, and that the Plan provides for a sufficient land supply to deliver the overall requirements of the Borough.
- 3.45 However, it is acknowledged that there will be a lower rate of housing delivery in the first five years due to Green Belt release and infrastructure requirements. It is noted that the Council's housing land supply and performance (i.e. Housing Delivery Test) will be assessed against the Stepped Housing Trajectory rather than the annual average housing target of 945 dpa.
- 3.46 It is our Client's view that a positive approach to development should be taken, and that a phased "cap" to development should not be utilised; this should be removed in its entirety. The stepped approach appears to be a consequence of the Council placing an over-reliance on the delivery of Strategic Sites, whereby the delivery of actual housing will be delayed as a result of associated infrastructure requirements.
- 3.47 Accordingly, the Council needs to review its development strategy to ensure that sufficient flexibility is built-in to the Plan to facilitate the early delivery of new housing during the Plan period, regardless of whether this approach would result in a higher rate of delivery within the first 5 years of the Plan period. To this end, it is not considered that site-specific phasing through the Plan policies is required, as the market and infrastructure requirements will ultimately dictate the phasing strategy. It is also unclear if there is an ability in the market to facilitate the deliver the amount of apartment housing proposed in the waterfront and town centre areas.
- 3.48 The Submission Version has also indicated that *"If monitoring indicates that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan"*.

- 3.49 Policy DEV1 states that the Council will only give due consideration to a review or partial review of the Local Plan – this is not a firm commitment. Our Client considers it necessary to include a mechanism to ensure that the Council is able to demonstrate and maintain a delivery 5-year housing land supply throughout the Plan period. This should comprise either a partial review of the Local Plan if necessary, triggered after a period of under-delivery (such as 3-5 years). This will provide greater certainty to developers in relation to the circumstances when further land release will be required. This should be applicable to the overall housing requirement figure of 945 dwellings rather than the phased trajectory.
- 3.50 This approach as drafted is contrary to Paragraphs 28 – 33 of the NPPF clearly set out the need for Local Plans to be underpinned by relevant and up-to-date evidence and should be reviewed every 5 years. Regard has been made to these policy requirements in the preparation of this representation.
- 3.51 As detailed above, an assessment of the Council’s housing supply has been undertaken and is discussed in Section 4 of this Statement.

4.0 HOUSING LAND SUPPLY POSITION OVERVIEW

Context

- 4.1 For Warrington, Policy DEV1 states most new homes will be delivered within the existing main urban area, the existing inset settlements and other sites identified in the Council's 2018 Strategic Housing Land Availability Assessment (SHLAA), which together have an identified deliverable capacity for a minimum of 13,726 new homes.
- 4.2 Combined with sites allocated as sustainable urban extensions in Policy DEV1, a small site allowance and completions in 2017/18, the Housing Trajectory at Appendix 1 of the Submission Version Local Plan claims the Council has **a total developable supply of 20,643 dwellings over the Plan period**. The sources of supply are repeated in Table 1 below.

No.	Location	No. of Homes
1	Town Centre	4,007
2	Wider Urban Area (SHLAA Sites < 0.25ha)	4,133
3	Waterfront	2,542
4	South West Extension	1,631
5	Garden Suburb (Phase 1)	930
6	Garden Suburb (Masterplanning area)	4,201
7	Inset Settlements (SHLAA Sites < 0.25ha)	221
8	Inset Settlements (Green Belt release)	1,085
9	Other (SHLAA Sites < 0.25ha)	90
10	Small Site Allowance (Sites > 0.25ha)	1,444
11	Completions (2017-2018)	359
	Total:	20,643

Table 1: Warrington Housing Land Supply

- 4.3 Having reviewed the Council's evidence base¹, our Client is concerned that the Council has overestimated the availability and deliverability of the housing land supply within the Plan period. The importance of having a robust and realistic evidence base is paramount to the soundness of the Local Plan given that its findings seek to justify whether the Council's development strategy will meet the Borough's housing needs over the next 30 years. As such, this Section of our representation seeks to outline our key areas of concern

¹ SHLAA (2018), Urban Capacity Study (2019), Development Options and Site Assessment Technical Report (2019) and Viability Assessment (2019)

that need be addressed prior to the submission of the Local Plan to the Secretary of State. This response should be read in conjunction with Appendix 3 of this Submission.

National Planning Policy Framework (NPPF) (2019)

Section 5: Delivering a sufficient supply of homes

- 4.4 Paragraph 67 of the NPPF requires strategic policy making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 4.5 Planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period (with the appropriate buffer) and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 4.6 Paragraph 73 of the NPPF requires strategic policies to include a trajectory illustrating the expected rate of housing delivery of the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of delivery for specific sites.
- 4.7 Annex 2 of the NPPF seeks to define the terms 'deliverable' and 'developable'. For a site to be considered deliverable, sites for housing should:

"be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example, because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)

b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant for permission in principle, or is identified of a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years".

4.8 For a site to be considered developable, the NPPF defines the term as:

"...sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

4.9 In terms of windfall sites, the NPPF² states that where an allowance is to be made for windfall sites as part of anticipated supply, *"there should be compelling evidence that they will prove a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."*

Section 11: Making effective use of land

4.10 The NPPF is clear that planning policy should promote an effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment. As such, national policy seeks to make as much use as possible of previously developed or 'brownfield land', except where this may cause conflict with other policies within the Framework³.

4.11 To ensure planning policies make efficient use of land and achieve appropriate densities, paragraph 122 of the NPPF states local planning authorities should consider:

- The identified need for different types of housing and other forms of development and the availability of land suitable for accommodating it;
- Local market conditions and viability;
- The availability and capacity of infrastructure and services – existing and proposed and their potential for further improvement;
- Desirability to maintain an area prevailing character and setting or promoting regeneration and change; and
- Importance of securing well-designed, attractive and healthy places.

National Planning Policy Guidance (2019)

4.12 The NPPG emphasises the importance of SHLAA's in the preparation of Local Plans and provides additional guidance on the factors that should be considered when assessing the availability, suitability and deliverability of a site. A summary of the relevant guidance relating to each of these factors is set out in Table 2.

² NPPF Paragraph 70

³ NPPF Paragraph 117

Assessment Criteria	Factors to Consider
Suitability	<p>Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.</p> <p>In addition to the above, the following factors should be considered to assess a site's suitability for development now and in the future:</p> <ul style="list-style-type: none"> • Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; • Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; • Appropriateness and likely market attractiveness for the type of development proposed; • Contribution to regeneration priority areas; and • Environmental/amenity impacts experienced by would be occupiers and neighbouring areas.
Availability	<p>A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.</p>
Deliverability	<p>A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.</p>
Timescales	<p>The local planning authority should use the information on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development. This may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year.</p>

Table 2: SHLAA Assessment Factors

4.13 This guidance alongside the requirements of national planning policy have been used to inform our assessment of the Council's housing land supply set out in Appendix 1 of the

Submission Version Local Plan to ultimately determine whether it is sufficient to meet the Borough's housing needs.

- 4.14 Set in this context, the following section of our representations sets out our Client's comments in relation to the methodology adopted by the Council in preparing their SHLAA (2018) before providing our comments in relation to the overall housing supply as well as the individual elements.

Review of the SHLAA Methodology

- 4.15 Our Client is generally supportive of the methodology set out within the SHLAA (2018), provided that it has been implemented consistently across all sites. Nonetheless, overall the methodology aligns with the guidance set out in the NPPG and, in the main, the evidence presented in the appendices is comprehensive and appropriate to justify the assumptions used in relation to density, lead-in times, build out rates and small sites.
- 4.16 Our Client does, however, have some reservations regarding the assumed lead-in times for '*sites without planning permission*' set out in Table 2.2 of the SHLAA⁴. The evidence used to justify these assumptions⁵ only considers the average lead-in times for developments of 500 units or less rather than larger strategic sites of 1000 units +. Moreover, the evidence does not factor in the time required to prepare technical reports and plans at the pre-application stage.
- 4.17 Our Client contests that the lead-in times for strategic sites (Warrington Waterfront, Garden Suburb, South West Extension and Peel Hall) should be dealt with as a separate category in Table 2.2 given their significant scale, the complexities in delivery and the policy requirement to prepare and adopt a comprehensive masterplan prior to the submission of any subsequent planning applications for individual phases of development.
- 4.18 Our experience of strategic sites elsewhere in the North West⁶ suggests masterplan documents can take approximately 18 months to prepare and adopt post adoption of the Local Plan. Technical reports and plans can be prepared alongside the masterplan document; therefore, our Client considers a 5.5-year lead in time is more appropriate for strategic sites. However, this lead-in time can often be longer when considering the infrastructure requirements for each site and this will need to be considered on a site-by-site basis.

⁴ 2.5 years for sites below 150 dwellings and 4 years for sites above 150 dwellings

⁵ Appendix 5- Sample Site Lead-In Times, SHLAA (2018)

⁶ Knowsley Council

4.19 In terms of applications for less than 500 units, typically applications can take up to a year to prepare depending on their complexity. As such, the lead in times for sites without planning permission should be increased to 3.5 years for sites below 150 dwellings and 5 years for sites above 150 dwellings but less than 500 units.

A Review of the Overall Housing Land Supply

4.20 As detailed in Table 2, the total identified housing land supply available in Warrington is 20,643 dwellings. Policy DEV1 proposes a minimum requirement of 18,900 new homes to be delivered over the Plan period (2017 to 2037), which equates to a 9% buffer in the housing land supply.

4.21 Whilst our Client welcomes the uplift to the Standard Method based housing need, as detailed in Section 3 of our representation, the Council has not provided any sound justification for not utilising the upper limit figure of 955 dwellings per annum set out in the LHNA, which would equate to 19,100 dwellings over the plan period and a housing land supply buffer of 8%.

4.22 This buffer may appear to provide a reasonable degree of flexibility in the housing land supply to deliver its housing need. However, this is only on the basis that the identified sources of supply set out in Table 2 are deemed to be sufficiently robust, which we do not consider to be the case for the reasons set out below.

Assessment of Warrington's Housing Land Supply

4.23 We have undertaken an assessment of the proposed housing land supply and contribution towards Warrington's housing needs. This is based on evidence contained within the Council's SHLAA (2018), Urban Capacity Study (2019), Infrastructure Delivery Plan (2019) and Local Plan Viability Assessment (2019).

4.24 Our Client's principal concerns relate to the deliverability and availability of brownfield land to meet the Borough's housing needs over the Plan period. As such, the tables set out at Appendix 1 of our representation include a detailed assessment of urban sites of 50 dwellings or more from each of the following sources of supply identified in Table 2.

1. Warrington Town Centre
2. Wider Urban Area (SHLAA Sites of 0.25ha and above)
3. Waterfront

4.25 We summarise our comments in relation to these sources of supply below before providing our comments on the deliverability of the remaining sources of supply:

4. South West Extension
5. Garden Suburb (Phase 1)
6. Garden Suburb (Masterplanning area)
7. Inset Settlements (SHLAA Sites < 0.25ha)
8. Inset Settlements (Green Belt Release)
9. Other (SHLAA Sites < 0.25ha)
10. Small Sites Allowance (Sites > 0.25ha)
11. Completions

1. Warrington Town Centre

- 4.26 Policy TC1 supports and promotes the comprehensive redevelopment and regeneration opportunities in accordance with the Town Centre Masterplan in the following areas:
- The Stadium Quarter
 - The Eastern Gateway (including Cockhedge/St. Mary's Quarter/St. Elphin's Quarter/Thorneycroft)
 - The Cultural Quarter (including Cabinet Works/Garven Place/Bank Park)
 - The Southern Gateway (including Wharf Street)
- 4.27 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan and at Appendix 2 of the Urban Capacity Study state that the Town Centre has the capacity to deliver 4,007 dwellings over the Plan period and will meet 21% of the Borough's minimum total housing need.
- 4.28 Whilst we commend the Council's overall aspirations for Warrington Town Centre, the development of high-density apartments and flats does not reflect the findings of the LHNA and the demand for family housing in Warrington. Furthermore, delivering a high proportion of housing growth in Town Centre locations would require significant investment in new infrastructure to meet the needs of families (i.e. schools, health care and open space) as well as a shift in perceptions to draw people to live in Town Centre locations.
- 4.29 The expectations for housing delivery in the Town Centre must be realistic, must reflect what the market can deliver and must supply housing that people need. To avoid the release of greenfield and Green Belt land through a reliance on sites and housing types that will not come forward or meet development needs is to provide a strategy that is not positively prepared, effective or justified.

4.30 To assess the robustness of the Town Centre Masterplan, Table 1 at Appendix 1 of our representation considers the suitability and deliverability of individual parcels within the Masterplan area. To summarise, our assessment has identified the following concerns:

- Inconsistencies between the anticipated capacity of sites across the Council's evidence base⁷;
- Not all the land identified for development in the Stadium Quarter, Arpley Road, Bridge Street Quarter, Cockhedge Quarter, St. Elphin Quarter and the Southern Gateway is currently available, with ongoing businesses and uses operating. The Council has not presented any evidence to demonstrate there are reasonable prospects that the land will become available over the plan period;
- The areas named above are subject to a complex range of landownerships and interests and there is no evidence to suggest that sites are being promoted for residential development or that there is developer interest in delivering housing on these sites. Landowners may not agree with the identified uses for their land as identified by the Council's masterplanning exercise and there is no evidence to suggest the Council is looking to acquire these sites via a compulsory purchase order;
- The Town Centre Masterplan does not give due consideration to the potential adverse impact of redeveloping sites on designated heritage assets in the Stadium Quarter and Cockhedge Quarter;
- At the time of writing there were no pending planning applications within the area which might be considered to be capable of making a significant contribution to the delivery of housing in the Town Centre in the short term; and
- The Southern Gateway sites fall within Flood Zones 2 and 3. In accordance with the NPPF, the Council has not provided any evidence to demonstrate that the sequential test can be overcome. This area cannot, therefore, be considered suitable to accommodate residential development.

4.31 Table 3 identifies the Town Centre Masterplan parcels which should be removed from the Council's overall supply because they do not meet the definition of developable set out within the NPPF. The Table also provides a breakdown of the number of units to be removed from each of the character areas.

⁷ SHLAA and Urban Capacity Study

Character Area	Parcels to be removed ⁸	No. of units to be discounted from 5 year housing land supply	No. of units to be discounted from overall supply
Stadium Quarter	A20 and A26	35	215
Bridge Street Quarter	B2	62	62
Cockhedge Quarter	C1, C2, C7 and C8	0	380
St. Mary's Quarter	-	0	0
St. Elphins Quarter	E9, E10, E11, E12 and E13	0	94
Thorneycroft	-	0	0
Cabinet Works	-	0	0
Bank Quay	-	0	0
Southern Gateway	I4, I5, I8, I12, I13, I14, I15, I17, I18 and I19	40	528
Arpley Road	J1, J2, J3, J4 and J5	55	782
Total:		192	2,061

Table 3: Units to be discounted from Town Centre Housing Land Supply

- 4.32 Overall, our Client supports the regeneration of the Town Centre. However, our assessment of the individual development parcels that make up the Town Centre Masterplan casts significant doubt over the suitability and developability of several development parcels and our Client considers that this area of growth should be treated with extreme caution.
- 4.33 As a minimum, 192 dwellings should be removed from the Council's five-year housing land supply and 2,061 dwellings should be removed from the overall Town Centre supply, reducing the supply from 4,007 dwellings to 1,946 dwellings. This discount equates to almost a 50% reduction in the Town Centre supply and on this basis alone the Council must seek to allocate additional sites which are suitable, available and deliverable and will help meet the housing needs for the Borough.

⁸ Using Urban Capacity Study references

2. Wider Urban Area (SHLAA Sites of 0.25ha and above)

- 4.34 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms that SHLAA Sites within the Wider Urban Area of Warrington are expected to contribute 1,382 dwellings in the first five years of the Plan and will deliver 4,133 dwellings over the lifetime of the Plan.
- 4.35 This source of supply includes sites that are under construction, those with extant planning permission and sites that have been identified as being suitable to come forward within the Plan period but do not currently benefit from planning permission.
- 4.36 To assess the robustness of the SHLAA Sites, Table 2 at Appendix 1 of our representation considers the deliverability of sites with an indicative capacity of at least 50 dwellings or more. Of the 13 sites assessed in detail, 2 of the sites are not considered developable over the Plan period⁹. As such, the 2 sites have been discounted and 160 dwellings removed from the overall supply.
- 4.37 Notwithstanding this, expecting 100% of the 4,133 dwellings to come forward over the Plan period is completely unrealistic. We, therefore, suggest that as an absolute minimum the above sites (160 dwellings) should be discounted from the Wider Urban Area supply and a conservative 10% discount applied to the remainder of the unassessed sites for non-implementation (a further reduction of 397 dwellings).
- 4.38 Overall, a total of 557 dwellings should be removed from the Wider Urban Area supply reducing this element of the supply from 4,133 dwellings to 3,576 dwellings. Apply a 10% non-implementation rate for to the five-year housing land supply (138 dwellings) reduces this supply from 1,382 dwellings to 1,244 dwellings.

3. Warrington Waterfront

- 4.39 Warrington Waterfront extends from the south-west of the Town Centre towards the Manchester Ship Canal and broadly following the course of the River Mersey. Policy MD1 states that the Warrington Waterfront will be allocated as a new urban quarter to deliver around 2,000 new homes and a major employment area, incorporating an enlarged multi-modal port facility and a business hub.

⁹ Cardinal Newman High School (SHLAA Ref: 1178) and PDC Irwell Road, Latchford (SHLAA Ref: 2182)

- 4.40 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan and at Appendix 2 of the Urban Capacity Study confirms that the Waterfront has the capacity to deliver 502 dwellings in years 1-5 and 2,542 dwellings over the Plan period.
- 4.41 Our Client does not object to the inclusion of the Waterfront as a strategic allocation within the Local Plan given it aligns with the Council's regeneration priorities for the Borough. However, our Client is concerned that the trajectory as drafted does not provides a reasonable reflection of housing delivery rates in the Waterfront area in the first five years of the Plan period.
- 4.42 Appendix 2 of the Urban Capacity Study expects parcels K9 (368 units), K10 (162 units), K19 (27 units) and K20 (35 units) to contribute 502 dwellings towards the Council's five-year housing land supply. Our assessment set out in Table 3 at Appendix 1 of our representation discounts parcel K9 (Spectra Building, South of Centre Park Business Park) on the basis the site does not benefit from planning permission, is located in Flood Zone 3, and the Council has not provided any evidence to demonstrate that the sequential test can be overcome.
- 4.43 The southern part of this land parcel (parcel K10) is expected to contribute 168 dwellings to the housing land supply. Our Client does not dispute that this site is available or suitable for development over the course of the Plan period. However, the site does not benefit from planning permission and based on the lead-in times set out in Table 2.2 of the SHLAA another 107 dwellings should be removed from the five-year housing land supply.
- 4.44 In addition, the Council has not presented any evidence to demonstrate that parcels K19 and K20 in Sankey Bridge meet the definition of 'deliverable' or 'developable' set out within the NPPF. Both sites should be discounted, and an additional 57 dwellings removed from the five-year supply as well as the overall supply.
- 4.45 Based on our findings summarised above, 502 dwellings should be removed from the first five years of the Plan meaning the site will make nil contribution towards the five-year housing land supply. Furthermore, removing 430 dwellings from the Waterfront supply reduce the overall supply from 2,542 dwellings to 2,112 dwellings.
- 4.46 When reviewing the deliverability of the wider Waterfront site (parcels K5 and K7), our Client previously raised concerns that this area would not deliver any homes within the first five years of the Plan period due to uncertainties regarding the delivery of the Western Link Road and timescales for remediation. Appendix 2 of the Urban Capacity

Study confirms the Council seeks to push back the delivery on this site to 2023/24 to align with the timescales for the construction of the Western Link Road.

- 4.47 Whilst our Client welcomes the alterations made to the trajectory, we still consider the proposed timescales for the Western Link Road to be optimistic given its delivery will be technically challenging requiring a significant amount of engineering projects including the need for new crossings of the Manchester Ship Canal, the West Coast Mainline, and the Warrington to Liverpool Railway line.
- 4.48 The project also has the potential to result in adverse environmental effects with most routes traversing through both Morley Common and Sankey Valley Park, necessitating careful design and mitigation. However, given the progress made since the previous iteration of the emerging Local Plan and in the absence of alternative evidence we do not seek to contest the timescales set out by the Council.
- 4.49 In terms of the expected rates of delivery, beyond the first five years the trajectory for this area increases to 220-255 dwellings per annum in years 7 to 13 of the Plan. Whilst this level of development is potentially achievable given new homes will largely comprise high density flats/apartments, the proximity to the Town Centre brings into question whether this level of growth can consistently be achieved given it will be dependent on the capacity of the market, availability of finance/credit, and resourcing. These are matters which are largely beyond the control or influence of the Council. As such, the Council should not seek to rely on this site.
- 4.50 Accordingly, the most effective means by which to protect the Plan would be to reduce its reliance on the delivery of this site and provide for additional market choice in those locations which experience housing need and demand, and thus boosting overall supply. The application of this approach would significantly enhance the overall deliverability of the Plan and provide a strategy which has a greater degree of flexibility to change.

4. South West Extension

- 4.51 The South West Urban Extension includes land to the north of the A56 at Higher Walton. Policy MD3 seeks to remove this land from the Green Belt to deliver a sustainable urban extension to the main urban area of Warrington, providing 1,600 new homes. The urban extension will support a new community in a high-quality residential setting with ease of access to Warrington's employment, recreation and cultural facilities.
- 4.52 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms the South West Urban Extension has the capacity to deliver 1,631 dwellings over the Plan

period at a rate of approximately 116-117 dwellings per annum. The Trajectory anticipates that the first homes will be completed in 2023/24 once the Western Link Road has been constructed.

- 4.53 Our Client understand the Council has now secured £142.5m worth of funding from the Department of Transport towards the estimated total £212m build cost for the Western Link Road and the Council's evidence suggest this will be completed by 2024. As set out above, our Client remains of the view that the proposed timescales for delivery of the Western Link Road are optimistic. However, given the progress made since the previous iteration of the Local Plan and in the absence of alternative evidence we do not seek to contest the timescales set out by the Council.
- 4.54 Notwithstanding this, it should be borne in mind that development on the site cannot come forward until the Local Plan is adopted and the land will be released from the Green Belt. This is expected to be December 2020¹⁰. Furthermore, Policy MD3 requires the preparation of a detailed masterplan prior to the submission of any future planning application on the site. Based on the revised assumptions set out above, the lead-in time on this site is expected to be 5.5 years. Accordingly, the trajectory should be altered to deliver the first 58 dwellings in years 2024/25.
- 4.55 Our Client does not dispute that the South West Extension could deliver 116-117dpa consistently over the Plan period given the scale of the opportunity available. However, the dwellings expected to be delivered in the second half of 2035/36 and 2036/37 will now be delivered beyond the Plan period and, therefore, 290 dwellings should be removed from the Council's overall supply reducing it to 1,341 dwellings.

5. Garden Village Suburb (Phase 1)

- 4.56 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan anticipates 930 dwellings will be delivered within the first phase of the Garden Village Suburb, 654 of which will be delivered within the first five years of the Plan period. The first phase of development will comprise the following sites owned by Homes England:
- Land at Appleton Cross – 350 dwellings
 - Grappenhall Heys – 400 dwellings
 - Land at Pewterspear Green – 180 dwellings

¹⁰ Local Development Scheme 2019

- 4.57 Our Client does not dispute that these sites are suitable, available and deliverable within the Plan period. However, as detailed in Table 4 at Appendix 1 of our representations our Client has concerns that the delivery rates proposed for the Appleton Cross and Grappenhall Heys sites are not achievable in the short-term given that neither site currently benefits from Reserved Matters approval.
- 4.58 Based on the lead-in times set out in Table 2.2 of the SHLAA, our Client would expect most of the housing to be delivered in years 6-10 rather than years 1-5. As such, 456 dwellings should be removed from the five-year housing land supply, reducing it to 198 dwellings.

6. Garden Village Suburb (Masterplanning area)

- 4.59 The Garden Village Suburb allocation relates to a large area of Green Belt land which extends from the south east of the Warrington Urban Area to the M6 and M56. Policy MD2 expects the Garden Suburb to deliver around 7,400 homes and a major new employment location of 116 hectares. Around 5,100 homes are expected to be delivered within the Plan period and a further 2,300 homes will come forward beyond the Plan period.
- 4.60 As set out above, phase 1 will deliver 930 dwellings across three sites at Appleton Cross, Grappenhall Heys and Pewterspear Green. The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms the wider masterplanning area has the capacity to deliver a further 4,201 dwellings over the Plan period at a range of between 108-396 dwellings per annum. The Trajectory anticipates that the first homes will be completed in 2023/24.
- 4.61 Our Client does not object to the conclusion made by the Council that this area provides a suitable location in which to deliver a significant number of new housing and strategic employment land. However, our Clients principal concern relates to the anticipated delivery rates for the site over the Plan period.
- 4.62 Notwithstanding our comment above in relation to Phase 1 of the Garden Village Suburb development, beyond the first five years of the Plan, the trajectory for this area increases substantially to over 300 dwellings per years during years 8 – 14, before returning to a lower rate of 200 dwellings + towards the end of the Plan period.
- 4.63 To deliver 300 dwellings plus per year would require around 6 developer outlets to be working across the area at any one time. This is considered achievable given the scale of the area and the desirability of the location. However, given the proximity of the Garden Suburb to the South West Urban Extension which seeks to deliver 1,600 units over the

Plan period, the achievability of this high rate of delivery being consistently achieved will be largely dependent on the capacity of the market, availability of finance/credit, and resourcing. These are matters which are largely beyond the control or influence of the Council.

- 4.64 Accordingly, the most effective means by which to protect the Plan would be to reduce its reliance on the delivery of a single area in a single geographic location. This would provide for additional market choice, delivering new housing in those locations which experience housing need and demand, and thus boosting overall supply. The application of this approach would significantly enhance the overall deliverability of the Plan and provide a strategy which has a greater degree of flexibility to change.
- 4.65 Notwithstanding this, it should be borne in mind that development on the site cannot come forward until the Local Plan is adopted and the land is released from the Green Belt. This is expected to be December 2020¹¹. Furthermore, Policy MD2 requires the preparation of a detailed masterplan prior to the submission of any future planning application on the site. Based on our revised assumptions set out above, the lead-in times on this site are expected to be 5.5 years; accordingly, the trajectory should be altered to deliver the first 54 dwellings in years 2024/25.
- 4.66 Our Client does not dispute the rates of delivery proposed within the Housing Trajectory given the number of developers intending to deliver the development is currently unknown. However, considering the above, the dwellings expected to be delivered in the second half of 2035/36 and 2036/37 will now be delivered beyond the Plan period and, therefore, 349 dwellings should be removed from the Council's overall supply reducing the capacity of this source of supply from 4,201 dwellings to 3,852.

7. Inset Settlements (SHLAA Sites < 0.25ha)

- 4.67 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms that SHLAA Sites within the Inset Settlements of Burtonwood, Croft, Culcheth, Hollins Green, Lymm and Winwick are expected to contribute 148 dwellings in the first five years of the Plan and will deliver 221 dwellings over the lifetime of the Plan.
- 4.68 This source of supply includes sites that are under construction, those with extant planning permission, and brownfield sites that have been identified as being suitable to come forward within the Plan period but do not currently benefit from planning permission.

¹¹ Local Development Scheme 2019

4.69 To assess the robustness of the SHLAA Sites, we have considered the deliverability of sites with an indicative capacity of at least 50 dwellings or more. Of the 1 site assessed – Land off Stretton Road/Arley Road, development is currently under construction and, therefore, the site is considered deliverable within the first five years of the Plan period. As such, our Client does not propose to remove any dwellings from this source of supply.

8. Inset Settlements (Green Belt Release)

4.70 Policy DEV1 seeks to deliver a minimum of 1,085 dwellings on allocated sites removed from the Green Belt in the outlying settlements of Burtonwood (160 homes), Croft (75 homes), Culcheth (200 homes), Hollins Green (90 homes), Lymm (430 homes) and Winwick (130 homes).

4.71 Our Client does not dispute that the sites identified for release from the Green Belt in the Inset Settlement will be delivered within the Plan period. As such, we do not propose to remove any dwellings from this source of supply as part of our assessment.

9. Other (SHLAA Sites < 0.25ha)

4.72 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms that SHLAA Sites of less than 0.25ha are expected to contribute 90 dwellings over the Plan period. All the sites included within this source of supply are less than 50 dwellings, therefore, we do not propose to remove any dwellings from this source of supply.

10. Small Sites Allowance (Sites > 0.25ha)

4.73 The Council has included a small site allowance of 76 dwellings per annum as part of their overall housing land supply. The justification for the inclusion of small sites is set out in paragraphs 2.60 – 2.63 of the SHLAA. Our Client considers the proposed small sites allowance is realistic given that it is based on evidenced historic trends over the past 10 year. As such, the Council's approach to the small sites allowance complies with paragraph 70 of the NPPF.

11. Completions

4.74 The overall supply figure set out at Appendix 1 of the Submission Version Local Plan includes the 359 dwellings completed in 2018/19. Our Client does not dispute this figure and its contribution towards the Council's housing land supply.

Overall Housing Land Supply Conclusions

4.75 Our assessment of Warrington's housing land supply has identified a reliance on the delivery of several strategic sites to meet the Borough's future housing needs. As set out above, our Client has significant concerns regarding the availability and deliverability of urban sites within the Town Centre and the Waterfront area as well as the anticipated delivery rates for the South West Extension and Garden Village Suburb given the lead-in times for delivery and their proximity to one another.

4.76 Table 4 below summarises the differences between the Council's claimed housing land supply Plan compared to our own assessment of the housing land supply.

No.	Location	WBC Total Supply	BW Total Supply	Difference
1	Town Centre	4,007	1,946	2,061
2	Wider Urban Area (SHLAA Sites < 0.25ha)	4,133	3,576	557
3	Waterfront	2,542	2,112	430
4	South West Extension	1,631	1,341	290
5	Garden Suburb (Phase 1)	930	930	0
6	Garden Suburb (Masterplanning area)	4,201	3,852	349
7	Inset Settlements (SHLAA Sites < 0.25ha)	221	221	0
8	Inset Settlements (Green Belt release)	1,085	1,085	0
9	Other (SHLAA Sites < 0.25ha)	90	90	0
10	Small Site Allowance (Sites > 0.25ha)	1,444	1,444	0
11	Completions (2017-2018)	359	259	0
	Total:	20,643	16,956	3,687

Table 4: Housing Land Supply Summary

4.77 Based on our analysis, we have identified a significant shortfall in the overall housing land supply. To ensure that the Council meets its proposed housing requirement of 19,100 dwellings, an additional 1,944 dwellings need to be identified within the Local Plan. However, as set out above, the Council should seek to provide 10% flexibility in their supply to allow for non-implementation.

4.78 **Overall, the Council will, therefore, need to identify additional land to deliver 3,834 dwellings over the Plan period.**

- 4.79 Considering alternative scenarios, **based on the LHNA upper limit of 19,100 dwellings (955 dpa) with a 10% allowance for flexibility in the supply the Council would need to identify an additional 4,054 dwellings.** Based on a higher uplift to **20,000 dwellings (1,000 dpa) which includes a 10% uplift for affordable housing the Council would need to identify an additional 5,044 dwellings over the Plan period** with a 10% allowance for flexibility in the supply.
- 4.80 Set in this context, there is an urgent need for the Council to allocate additional land within the Warrington Local Plan, which is suitable, available and deliverable and will help to meet the housing needs of the Borough. Considering our concerns regarding the deliverability of urban sites within the Town Centre and at the Waterfront, the Council needs to consider the release of further Green Belt sites to meet the needs for low-density family housing. This includes our Client's interests at Hollins Lane, Winwick. The merits of allocating this site for development are considered in Section 7 of this representation.

Five-Year Housing Land Supply

- 4.81 Appendix 1 of the Submission Version Local Plan anticipates that the Council will deliver 4,132 dwellings over the first five years of the Plan period. However, based on our analysis, we contest that 1,288 dwellings should be removed from this supply resulting in an overall five-year supply of 2,844 dwellings. Our assessment is based on the removal of:
- 192 dwellings from the Town Centre;
 - 138 dwellings from the Wider Urban Area;
 - 502 dwellings from the Warrington Waterfront; and
 - 456 dwellings from Garden Suburbs (Phase 1).
- 4.82 The removal of 2,844 dwellings from the first five years of the Plan will result in the delivery of these dwellings being pushed back towards the middle and end of the Plan period. This has potentially serious implications for the Council in meeting its short-term housing needs as well as maintaining a five-year housing land supply, particularly given the proposed stepped approach to housing delivery. As such, alongside a robust mechanism to secure a review of the Plan every five years, the Council needs to allocate additional land within the Warrington Local Plan, which is suitable, available and deliverable in the short term to ensure these needs are met.

5.0 SUBMISSION VERSION POLICIES

5.1 We set out below our comments in relation to a number of the proposed Submission Version Local Plan policies below. At the outset, we note that some of the policies as drafted are extremely lengthy and should be separated into different policies in order to ensure that the main elements of the policies are not 'lost.'

Policy DEV2 – Affordable Housing

Affordable Housing

5.2 Paragraph 62 of the NPPF is clear that policies should specify the type of affordable housing required, and that it should be met on-site unless off site provision or financial contribution can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities. Of these, at least 10% of the overall provision of new affordable homes is to be available for home ownership, unless this would exceed the level of affordable housing required in the area or prejudice the ability to meet the identified affordable housing needs of specific groups.

5.3 Policy DEV2 states that on sites of 10 dwellings or more, affordable housing is to be provided based on the following thresholds: (a) 20% on sites within Inner Warrington, inclusive of the Town Centre, or (b) 30% elsewhere in the Borough, and all Greenfield sites irrespective of their location. Of the affordable housing provision, 10% affordable home ownership should be provided, with the remainder affordable rent or social rent. A lower split/tenure will be permitted where it can be demonstrated that it would not be financially viable.

5.4 Our Client recognises the need to provide affordable housing provision, and there is a clear and evidenced need for the provision of 377 affordable dpa within Warrington between 2017 - 2037. However, our Client has a number of concerns with the Policy as drafted:

- The NPPF (Para 64) is clear that planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, as part of the overall contribution from a site. However, Part (2) of Policy DEV2 states that "*the equivalent of 10% of the total number of homes within the development*". This is inconsistent with national policy and should be updated to reflect this.
- Point 4 states that affordable housing should be provided on-site and only in exceptional circumstances, where the nature of the site is deemed unsuitable for

affordable housing, will a commuted sum be acceptable. This is contrary to Paragraph 62 of the NPPF which states whilst affordable housing is expected to be met on-site, instances where it is considered to be acceptable is where "*off-site provision or an appropriate financial contribution in lieu can be robustly justified*". The Policy should be amended to reflect and ensure compliance with the NPPF.

- Section 5.1 of Council's Viability Report (prepared by BNP Paribas) identifies support for the emerging affordable housing provision; however, there are instances where the Council will need to provide flexibility in their policies, and have regard to individual site viability, and where a case is made, to adjust the amount of affordable housing provision. We have established through a high-level review of the Report that circa 18 sites are identified as unviable within Cushman and Wakefield's Viability Assessment (contained with BNP Paribas's report). This will in turn impact on the delivery of affordable (and open market) homes within the Borough, and the potential for the non-delivery of homes. Paragraph 34 of the NPPF is clear - Plans should set out the contributions expected from the development and should not undermine the delivery of the Plan. The conclusions of the Report raises serious questions over the deliverability and viability of the Plan.

Housing Type and Tenure

- 5.5 Paragraph 60 of the NPPF is clear that the size, type and tenure of housing needs for different groups should be assessed and reflected in planning policies. Parts 7 – 8 of the Policy identifies that residential development should provide a mix of different housing sizes and types which should be informed by the Borough wider housing mix target and any local target set by a Neighbourhood Plan, when taking into account site-specific considerations. The text refers to a table; however, no table is provided within the Policy, but instead is included within the supporting text (Table 3) which is based on an assessment identified within the LHNA with a notable demand for 1 and 2 bed affordable rented properties and 2 bed houses. There is also high demand for 3 bed market houses.
- 5.6 Our Client is supportive of the need for a mix of housing and the provision of a range of house types. However, consideration should be given to the local area and the type of housing required, rather than a Borough-wide requirement, i.e. due to variances between Green Belt and Inner-City localities. Viability also needs to be considered as part of the housing mix.

Optional Standards

- 5.7 The Policy (Parts 9 – 10) seeks to provide 20% of homes to building regulation standard M4(2) Accessible and Adaptable Dwellings and where there is an identified need 5% of new homes will be wheelchair accessible in accordance with Building Regulation Standard M4 (3).
- 5.8 Our Client is supportive of the provision of accessible homes. However, further evidence is required to support this requirement. Whilst the LHNA identifies that the economic-led need is circa 4.7% (871 new homes), as required by PPG (ID 56-07) which identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability, this evidence is not provided within the LHNA. The LHNA is clear that any decisions about the mix of housing should take account of current stock, and where the most appropriate locations for this will be. This information has not been supplied by the Council rather it states that it used the LHNA to set the percentage.
- 5.9 As such, to ensure that this Policy is robust and can be found sound, further justification is required.

Housing for Older People

- 5.10 The Council seeks to provide 20% of the affordable provision to meet the needs of older people. This will be determined on a site by site basis. Again, whilst our Client does not dispute the need for older person accommodation where evidenced, it is unclear how this provision differs from the need to provide M4(2) Accessible and Adaptable Homes or whether separate specialist housing is required, as identified within the LHNA which discusses housing with support, housing with care and care beds. Further evidence is also required in relation to how this provision will be determined on a "site by site" basis pending on demand and type of provision.

Policy DEV3 – Gypsy and Traveller and Travelling Show People Provision

- 5.11 No comment.

Policy DEV4 – Planning for Economic Growth

- 5.12 Our Client is broadly supportive of the level of economic growth proposed, and the need for a minimum of 362 ha of employment land to be delivered to ensure that the economic and housing needs of the Borough can be met, and the identified Vision and Objectives realised. The Policy is appropriate in helping to achieve this level of growth.

Policy DEV5 – Retail and Leisure Needs

- 5.13 No comment.

Policy GB1 – Green Belt

- 5.14 Section 3 of the Submission Version explains the approach which the Council has taken towards the release of land in the Green Belt. This Section confirms that Green Belt boundaries should only be altered where exceptional circumstances are fully justified and evidenced, through the preparation or updating of plans. The approach to defining new boundaries should be set out in strategic policies, consistent with Paragraph 135 of the NPPF, and demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances have made the adoption of this exceptional measures necessary; the consequences of the proposal for sustainable development; necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and how the Green Belt would meet the other objectives of the NPPF.
- 5.15 The Council has identified that the general extent of the Green Belt through the Plan period will be maintained until at least 2047. It is accepted that there is a need for Green Belt release and this approach is supported by our Client in principle. As set out in Sections 2 and 3, our Client welcomes the Council's recognition that there is a need to review and release land from the Green Belt to meet the Borough's overall housing requirements over the Plan period and beyond.
- 5.16 However, and upon conclusion of our assessment of urban capacity, it is considered that there is a need for further Green Belt release to meet the overall housing needs in the Borough. This is on the basis that our Client considers the Council to have over-estimated the supply from land within the Urban area, and that further Green Belt land is required to meet the housing requirements of the Borough. This is discussed in Sections 3 and 4 of this representation. It is our position that further Green Belt release in outlying settlements is required to ensure the delivery of the Local Plan and to ensure the Plan is directed to the right locations.

Policy TC1 – Town Centre and Surrounding Area

- 5.17 Our Client supports the development of the Town Centre, and the need to strengthen its viability and viability to promote a greater diversity of uses. Notwithstanding this, they have a number of concerns with the identified Key Development Sites in the Town Centre in terms of capacity and deliverability, and consider that the Council has over-estimated the scale of development, the proposed density and the timescales envisaged for the

delivery of the Town Centre regeneration sites and Southern Gateway. This is discussed in Section 4 of this representation.

Policy INF1 – Sustainable Travel and Transport

- 5.18 The Policy seeks to ensure that development is located within sustainable and accessible locations; priority is given to walking, cycling and public transport and that management measures such as reducing the number of cars and trip rates are proposed are utilised and that infrastructure for plug-in cars and low emission vehicles are utilised. Our Client is supportive of the Plan's policy in respect of the need to provide a safe and efficient highway network.
- 5.19 It is noted that Paragraph 111 of the NPPF clearly states that all developments which generate *"significant amounts of movement should be supported by a Transport Statement or Transport Assessment"*. This is reflected in the emerging Local Plan. Additionally, it states that *"development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe"*. It is our Client's view that this should be referenced and clearly set out within Policy INF1.
- 5.20 We also consider that the Policy as drafted is too extensive, and would benefit from being divided into separate elements to ensure its requirements are not lost within the text i.e. (4) protect future re-use of disused rail corridors; (5) improving freight transport provision; and (6) sustainable transport of minerals and waste could be placed as separate policies.

Policy INF2 – Transport Safeguarding

Policy INF3 – Utilities and Telecommunications

- 5.21 No comment.

Policy INF4 – Community Facilities

- 5.22 Policy INF4 seeks to promote health and wellbeing and reduce social inequality. To facilitate this, developers will be required to provide new social and community infrastructure where a development would increase demand beyond its current capacity or generate a newly arising need, and should be located in close proximity to this need. It is unclear what these community requirements are, and they have not been factored into any viability scheme. Further consideration needs to be afforded to this Policy.

Policy INF5 - Delivering Infrastructure

- 5.23 This Policy refers to the need for development to provide or contribute towards the provision of infrastructure needed to support it, and the Council will seek planning

obligations where development creates a requirement for additional or improved serviced and/or address the off-site impact. Where new infrastructure is required to support a development, this must be operational no later than the appropriate phase of development for which its needed. These will be sought on a case by case basis and include affordable housing, public health, biodiversity, open space infrastructure and education. The Policy states that viability will only be considered at the planning application stage where required planning obligations are in addition to those considered as part of the Local Plan Viability Appraisal, or where there are exceptional site-specific viability issues not considered as part of this Appraisal.

- 5.24 A Community Infrastructure Levy ("CIL") is not yet in place in Warrington. The Council's website indicated in 2015 that it will be introduced as part of the Local Plan, and the emerging Local Plan indicates in Para 3.3.32 that the Council will consider CIL immediately following its adoption. However, Policy INF5 does not specify when or if this will be introduced, rather the supporting text refers to *"should the Council introduce it"*.
- 5.25 No reference is made in the IDP or Viability Appraisal to the introduction of CIL and no clarification is provided as what approach the Council will take if it is introduced in the future; this would clearly impact on the contributions and infrastructure required through the IDP.
- 5.26 Furthermore, the NPPF is clear that Plans should set out the contributions expected from development. This should include setting out the levels and type of affordable housing provision required, along with other infrastructure, such as that needed for education, health, transport, flood and water management, green and digital infrastructure. Such policies should not undermine the deliverability of the Plan.
- 5.27 Furthermore, Paragraph 56 of the NPPF states that planning Obligations should only be sought where they meet all the following tests:
- *Necessary to make development acceptable in planning terms;*
 - *Directly related to the development; and*
 - *Fairly and reasonably related in scale and kind to the development.*
- 5.28 The wording of the Policy is contrary to the NPPF (Para 57) which allows for *"the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. This is a matter for the decision maker"*.

5.29 Our Client does not consider the range of requirements identified meet these tests; whilst the IDP identifies a list of requirements, and indicative costs, there are no confirmed costs directly attributed to each scheme (albeit it is appreciated that some of the IDP's requirements are assigned to specific allocations).

5.30 PPG Paragraph 005 (Ref ID: 10-005-20140306) states:

"evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability. Greater detail may be necessary in areas of known marginal viability or where the evidence suggests that viability might be an issue – for example in relation to policies for strategic sites which require high infrastructure investment".

5.31 PPG Paragraph 007 (Ref: ID: 10-007-20140306) then states that:

"Plan makers should consider the range of costs on development. This can include costs imposed through national and local standards, local policies and the Community Infrastructure Levy, as well as a realistic understanding of the likely cost of Section 106 planning obligations and Section 278 agreements for highways works. Their cumulative cost should not cause development types or strategic sites to be unviable. Emerging policy requirements may need to be adjusted to ensure that the plan is able to deliver sustainable development".

5.32 It is our Client's view that, as drafted, the IDP is contrary to both the NPPF and PPG and is not based on a sound evidence base. Further details setting out how the requirements of the IDP will be delivered are required. As such, we consider the Policy as drafted to be contrary to Paragraph 173 of the NPPF and the PPG.

Policy DC1 – Warrington's Places

5.33 No comment.

Policy DC2 – Historic Environment

5.34 The Policy focuses on the need to preserve and protect the historic environment within Warrington. It is our consideration that this Policy is too lengthy as drafted and the requirements of the Policy are lost within the text as drafted. We would suggest that Part 2 (a) – (j) is inserted into an Appendix, rather than within the body of the text.

5.35 In terms of "assessing development proposals" the Policy should be amended to reflect and align with the NPPF to address the current conflict.

5.36 For example:

(4) Proposals affecting a designated heritage asset, or an archaeological site of national importance should conserve those elements which contribute to its significance., Harm to such elements will only be permitted where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset will be permitted only in exceptional circumstances

(5) Proposals which would remove, harm or undermine the significance of a non-designated heritage asset will only be permitted where the benefits are considered sufficient to outweigh the harm to the character of the local area.

5.37 This is incorrect. The NPPF is clear that in relation to (4), where a proposed development will lead to substantial harm to a designated heritage asset, LPAs should refuse planning permission unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits or criteria (a) to (d) apply relating to the nature of the unit preventing all reasonable uses no viable use of the heritage asset in the medium term through marketing; grant funding is no possible; and the harm or loss is outweighed by the benefit of bringing the site back into use. Furthermore, where a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits. In terms of non-designated assets, their significance should be taken into account, and a balanced judgement required having regard to the scale of any harm or loss and the significance of the heritage asset. The Policy should be revised to ensure that it aligns with the NPPF. As drafted, it does not.

Policy DC3 - Green Infrastructure

5.38 Whilst our Client has no objection in principle to the inclusion of a policy relating to Green Infrastructure, it is inevitable in some instances that existing green space will be lost. In relation to (6) we suggest that "*where appropriate*" should be added in relation to replacement green infrastructure.

Policy DC4 – Ecological Network

5.39 Our Client welcomes Policy DC4 and the differentiation in the Policy in relation to statutory and non-statutory designations and local and national designations.

Policy DC5 – Open Space, Outdoor Sport and Recreation Provision

5.40 The Policy applies to residential development sites of over 40 dwellings or more to contribute to the provision of open space and equipped play provision, and outdoor playing pitches, and indoor sport and recreational facilities. It is unclear why sites over

less than 40 dwellings do not have to provide, as this is typically based on minimum site size requirements. However, our Client does welcome the proposed flexibility to allow for off-site provision where on-site provision is not possible or appropriate.

Policy DC6 – Quality of Place

- 5.41 Our Client is generally supportive of this Policy and consider that it will ensure the delivery of high-quality development. It is noted in relation to Part (6) that in relation to masterplans that they may be adopted as SPGs or take the form of less formal planning guidance or development briefs. Clarification is required at the outset as to the approach which will be taken to provide certainty to developers.

Policy ENV1 – Waste Management

- 5.42 No comment.

Policy ENV2 – Flood Risk and Water Management

- 5.43 Our Client is generally supportive of this Policy. However, elements of it such as (4) (i.e. that no development should take place within 8m of the top of a water course etc) should be a matter of detail on a site-by-site basis discussed in conjunction with the LLFA rather than stipulated through Policy. This is a theme reiterated throughout the Policy, and which needs to be reviewed and amended accordingly.

Policy ENV3 – Safeguarding of Minerals Resources

Policy ENV4 – Primary Extraction of Minerals

Policy ENV5 – Energy Minerals

Policy ENV6 – Restoration and Aftercare of Mineral and Waste Sites

- 5.44 No comment.

Policy ENV 7 – Renewable and Low Carbon Energy Developments

- 5.45 This Policy seeks to minimise carbon emissions generated by and from new development. Site comprising more than 11 units in all locations outside of the strategic allocations will be required to meet at least 10% of their energy needs from renewable and/or other low carbon energy source(s). Strategic allocations will be required to establish or connect to decentralised energy systems which use or generate renewable or low carbon energy and ensure that at least 10% of their energy needs can be met from renewable and/or low carbon energy source(s).
- 5.46 It is our Client's position that the Policy should be revised to ensure it is consistent for all sites, and should not distinguish between non-allocated and allocated sites. It is also unclear how this Policy aligns with Policy DC6 which seeks to encourage the introduction of environmental design principles and climate change; reduce energy and water use

through design; and encourage the use of renewable/low carbon technology as appropriate. There is no alignment between the two policies, the latter of which stipulates the requirement to provide 10% of all energy needs from renewable resources. Consistency between both policies is required.

Policy ENV8 – Environmental and Amenity Protection

- 5.47 Policy ENV8 states that proposals for sensitive end uses which include residential are not desirable to those located in areas of poor air quality, or in noise sensitive areas. However, it is unclear how this correlates with the Council's intentions to deliver large-scale development within the town centre in air and noise sensitive locations. The Policy also states that in (16) that additional guidance in support of the Policy will be provided in the Design and Construction and Environmental Protection SPDs. It is our view that there is duplication in relation to the Policies DC6 and ENV8, and the SPDs, and there is no requirement for the contents of the Policy to be reiterated in the various policies.

Site Allocations

Site Allocations MD1 – OS8

- 5.48 No comment.

Policy OS9 – Land to the north of Winwick

- 5.49 Land to the north of Winwick is proposed to be removed from the Green Belt and allocated for a minimum of 130 homes.
- 5.50 The justification for the release of the site was derived from the Council's Green Belt Assessment undertaken by Arup in October 2016, with subsequent updates published in July 2017. It is our Client's maintained position that the Green Belt Assessment, namely its general approach and methodology, is flawed on the following basis:
- The land parcels assessed are inconsistently defined, with some utilising roads as boundaries whilst others relate to field boundaries;
 - The Assessment itself was not undertaken by those who defined its methodology, instead several Officers were briefed and undertook the Assessment individually. Whilst this allowed for local knowledge within the Assessment, it has also provided the opportunity for a level of divergence with the intended approach;
 - The Assessment fails to consider parcels relating to settlements in neighbouring authorities in the same way it does settlements within Warrington. This has the overall effect of some parcels towards the edge of the Borough identified as

making a lesser contribution to the Green Belt, despite being located on the edge of major settlements outside Warrington;

- The Assessment fails to fully consider existing urban influences on a site and how this influences the character of each assessed parcel, especially when determining openness and the restriction of urban sprawl;
- The Assessment fails to consider the potential for a development to create a new prominent and permanent edge to the settlement;
- The consideration of openness is not clearer explained. 30% built form on-site is assessed significantly different to 10% despite the fact that there could be little difference between the two and its impact on the perception of openness depending on the scale of the wider parcel; and
- It is unclear how the overall conclusions of the Assessment have been reached. The Assessment outlines a standardised weighting which is applied based on the significance of the impact observed for each Green Belt purpose. In our view a more bespoke approach is required, with the Assessment weighted towards the purposes of the Green Belt which the parcel more closely relates to.

5.51 Within the Council's Green Belt assessment, the site (SHLAA Ref: 2670/Site Ref: R18/040) is assessed as making a "*moderate contribution*" to the Green Belt. Our Client disagrees with this conclusion, and set out our assessment of the site against the five purposes of the Green Belt below in Table 5.

<p>To check the unrestricted sprawl of large built-up areas</p>	<p>The site will form an extension to the existing settlement of Winwick to the north and is not well related to the settlement, and does not form a natural rounding of the settlement as its development abuts the natural settlement boundary line. Furthermore, it is not well-connected to the settlement boundary on the basis that it is only bounded by the existing built up area on one side (i.e. to the rear of Spires Garden) plus there is a distinct separation from the site to the settlement boundary because of the large plot sizes relating to the land to the south. Whilst the roads create natural boundaries to the east (Waterworks Lane) and west (Golborne Road) the field boundary to the north does not create a good barrier between existing development and undeveloped land, and will result in the precedent for unrestricted urban sprawl – as the boundary to the north is</p>
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	not strong. As such, it is considered that the site will contribute to urban sprawl, and makes a <i>moderate contribution</i> to this purpose.
To prevent neighbouring towns merging into one another	The development of the site would extend the settlement further north than the current settlement boundary as formed by existing housing development along Spires Gardens, and the northern boundary to the site is not strong, particularly given the openness of the wider land parcel to the north of the site. Whilst it will not result in the mergence with the nearest settlement (Newton le Willows) to the north, it raises concerns over the impact on the open nature of the site on the wider visual landscape. It is considered that this fulfils a <i>weak contribution</i> to this purpose.
To assist in safeguarding the countryside from encroachment	<p>The release of the site would result in further opportunities for development. The boundary of the site which would be created is not a nature edge to the settlement, and would not result in the rounding of on the settlement boundary. It is our Client's position that this site fulfils a clear function in assisting in safeguarding the settlement from encroachment, a position which has been confirmed within the Council's own Green Belt assessment of the Site. The release and development of this site would result in the settlement extending north, well beyond the existing built-up area.</p> <p>Due to the large field pattern and the open, flat nature of the land in this location, it is not considered that the development of circa 132 dwellings could be accommodated in this area without the provision of a new, prolonged settlement boundary and the creation of an unnatural extension to the field boundary. This would significantly weaken the definable edge of Winwick leading to pressure for future land release in this location. On this basis it is considered that the Site is not deemed to be appropriate, and makes a <i>strong</i> contribution to the Green Belt.</p>
To preserve the setting and special character of historic towns	Development of the site would not conflict with this function of Green Belt.
Assist in urban regeneration, by	The need for Green Belt release has been established by virtue of the Council's assessment that there is insufficient

encouraging the recycling of derelict and other urban land	urban land to meet the Council's emerging housing requirements over the Plan period.
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Table 5 – Assessment of Land to the north of Winwick against Green Belt purposes

- 5.52 Furthermore, the SHLAA has previously concluded that the site is constrained in terms of proximity to GP services and natural greenspace; is located with Groundwater Source Protection Zone 1; is in close proximity to a historic landfill with potential for contamination; and that pylons run across the site. Notwithstanding these issues, the Council has concluded that the proposed housing allocation and future development of the site is acceptable on the basis that it can accommodate the identified housing requirement for Winwick (130 dwellings). The site's capacity is identified as 132 dwellings, albeit on 4.4 ha of the site has been assessed as deliverable. These on-site constraints, coupled with our concerns with the impact on the 5 purposes to the Green Belt raises significant concerns with the deliverability of the site.
- 5.53 As such, it is our Client's position that this is not the most suitable site for allocation within the emerging Local Plan and that other sites should be considered. We set out our position in relation to this in Section 7 of this response.

6.0 COMMENTS ON EVIDENCE BASE

6.1 This following Section sets out our response to the associated evidence base for the Local Plan, which are cross-referenced with Section 2 of this Statement.

Viability Study

6.2 An assessment of the Plan's Viability Study has been undertaken by BNP Paribas and Cushman and Wakefield. The Study, most notably the one prepared by Cushman and Wakefield, raises concerns that a number of the sites are unviable particularly as part of the Town Centre regeneration schemes i.e. Waterfront Parcel 2 - 4 (250 units in each parcel). This raises significant concerns over the deliverability and viability of a number of these sites, and whether all affordable housing contributions (20%) can be delivered on-site. It is also unclear as to whether all the abnormalities (as required through the IDP and set out below) have been fully taken into account. As such, coupled with our concerns regarding the viability of the IDP, results in significant concerns in relation to the deliverability of a number of the Council's sites. This is of paramount importance and should be read in conjunction with our comments in relation to Policy INF5.

Infrastructure Plan

6.3 Our Client acknowledges the requirement for infrastructure improvements to facilitate new development, and we refer to our comments provided in relation to contributions in Section 4 of this Statement.

6.4 As noted earlier, CIL is not yet in place in Warrington. The Submission Version indicates at paragraph 3.3.32 that the Council will consider the introduction of CIL immediately following the adoption of the Local Plan. However, Policy INF5 does not specify when or if this will be introduced, rather the supporting text refers to "*should the Council introduce it*". No reference is made in the IDP or Viability Appraisal to the introduction of CIL; accordingly, clarification on the Council's approach to CIL is required given that this will impact on the contributions and infrastructure required through the IDP.

6.5 A number of proposed works are assigned indicative costs and funding. Equally however, it is noted that a number of schemes, such as the M62 capacity and junction improvements, and M6 capacity improvements, whilst assigned to be delivered through Policy INF1 – sustainable travel and transport, do not.

6.6 Furthermore, in the instances where indicative costs have been provided, and funding is confirmed, there are a number of instances where there are substantial funding gaps, such as in relation to Flood Risk Management, which has an indicative cost of £14,300,000

but only £500,000 funding has been confirmed, with a funding gap of £13,800,000 which the Council envisages will be delivered by the Environment Agency, United Utilities and WBC contributions. There can be no guarantee of this source of supply, particularly when public body resources are being stretched. Accordingly, much greater certainty and evidence needs to be provided prior to the adoption of the Local Plan.

- 6.7 Additionally, it is noted that out of circa 160 infrastructure projects and elements to be delivered, there is in excess of a £1.54 billion funding gap required to bring forward these identified schemes; it is unclear how this gap will be met.

Urban Capacity Statement

- 6.8 An assessment of the Council's Urban Capacity has been undertaken, specifically in relation to the Town Centre regeneration areas, and is discussed in detail in Section 4 of this Statement.

SHLAA

- 6.9 An assessment of the Council's SHLAA has been undertaken and is discussed in detail in Section 4 of this Statement.

Options and Site Assessment Technical Report

- 6.10 This Report sets out the Council's development options and site assessments. This is largely discussed in relation to housing requirements in Section 3 of this Statement in relation to housing requirements and spatial distribution.

Green Belt Study

- 6.11 We refer to our comments provided in Section 5 of this representation and our conclusions that the Green Belt Assessment, namely its general approach and methodology, is flawed on the following basis:

- Land parcels assessed are inconsistently defined, with some utilising roads as boundaries whilst others relate to field boundaries;
- The Assessment itself was not undertaken by those who defined its methodology, instead several Officers were briefed and undertook the Assessment individually. Whilst this allowed for local knowledge within the Assessment, it has also provided the opportunity for a level of divergence with the intended approach;
- The Assessment fails to consider parcels relating to settlements in neighbouring authorities in the same way it does settlements within Warrington. This has the

overall effect of some parcels towards the edge of the Borough identified as making a lesser contribution to the Green Belt, despite being located on the edge of major settlements outside Warrington;

- The Assessment fails to fully consider existing urban influences on a site and how this influences the character of each assessed parcel, especially when determining openness and the restriction of urban sprawl;
- The Assessment fails to consider the potential for a development to create a new prominent and permanent edge to the settlement; and
- The consideration of openness is not clearer explained. 30% built form on-site is assessed significantly different to 10% despite the fact that there could be little difference between the two and its impact on the perception of openness depending on the scale of the wider parcel.

6.12 It is unclear how the overall conclusions of the Assessment have been reached. The Assessment outlines a standardised weighting which is applied based on the significance of the impact observed for each Green Belt purpose. In our view a more bespoke approach is required, with the Assessment weighted towards the purposes of the Green Belt which the parcel more closely relates to.

7.0 SITE PROMOTION – HOLLINS LANE, WINWICK

7.1 As the Council is aware, our Client has been promoting their existing land interests north of Hollins Lane, Winwick as a housing allocation through the emerging Local Plan. The extent of the Site subject to this promotion is shown in Figure 1 below:



Figure 1: Land off Hollins Lane, Winwick

7.2 The Site was submitted to the Council’s ‘Call for Sites’ exercise in November 2016. The submission outlined briefly our Client’s view that the Site represents a sustainable location for development, and is considered available, suitable and deliverable for housing within the short-term. The Site was again promoted through the emerging Local Plan in September 2017.

7.3 The Site is located to the north-west of Winwick, occupying a single field located to the north of Hollins Lane and west of Newton Road. The Site extends to 6.59 hectares and is bordered to the south by existing residential development, and to the north and east by an existing tree belt. Beyond this tree belt to the east (and partially to the north) lies the further built-up area of Winwick, with the village centre lying around 500m to the

east of the Site. To the west of the Site lies open countryside, with more distant views limited by changes in topography, intermittent vegetation and existing structures.

- 7.4 An existing public footpath runs within the western boundary of the Site providing a pedestrian connection between Hollins Road and Newton Road. The 329 bus service operates along Hollins Lane, providing a half-hourly service to Warrington and St Helens. There are two stops for services westbound and one stop for services eastbound along the Site frontage. Further bus provision (no. 360 Warrington to Wigan and no. 22 Warrington to Newton-Le-Willows Bus Services) is available within a short walking distance of the Site on Newton Road.

Site Specific Assessment

- 7.5 A Site Layout Plan has been prepared as part of the promotion of the Site. This layout plan builds upon the principles established within the accompanying Development Framework Document prepared in response to the 2017 consultation.
- 7.6 The Layout Plan confirms that the Site is able to accommodate 100 dwellings, based on an indicative mix of 2 – 4 bedroom properties, at a minimum density of 38 dph.
- 7.7 In the consideration of the Site Layout Plan, the following principles have informed the development:
- A circular looped walk through landscaped areas of public open space is a key driver of the scheme, and is reflective of the parkland to the south to aid orientation, linkages and the enhancement of PROW through carefully considered pedestrian links;
 - Clear character zones within the scheme are reinforced by density and step down towards POS / open landscape to give a rural edge to the development. This is further reinforced through the use of private drives;
 - Development blocks have been positioned in response to the topography;
 - Existing landscape features will be retained and incorporated into the green infrastructure network;
 - Vehicular access via Hollins Lane;
 - A range of housetypes will be provided across the site; with all properties arranged to face out onto street or POS whilst corner units designed to be double fronted for security/ sense of place;
 - Key vistas within the development terminated with focal 2.5 storey buildings where appropriate.

- New streets have been designed to prioritise pedestrians and creating clear road layouts for vehicles;
- Pedestrian and cycle connections will be provided;
- Provision of green spaces and infrastructure;
- Vehicular access via Hollins Lane;
- Sustainable drainage features, including swales and attenuation ponds; and
- Boundary treatments to the west of the site.

Suitability for Release from the Green Belt

7.8 The Council’s Green Belt Assessment was prepared by Arup in October 2016, with subsequent updates published in July 2017. The Green Belt Assessment has appraised the Land at Hollins Lane, Winwick for its role in meeting the five purposes of the Green Belt as defined by Paragraph 134 of the NPPF. This was assessed through Parcel reference WI3, and which concluded that the Site fulfils a strong contribution to the Green. Our Client maintains their objection to this Assessment and disagrees with the Council’s conclusions. Instead, they consider that the Site represents the leading candidate Green Belt land to be released for housing around Winwick.

7.9 We set out our assessment of our Client’s site below.

Purpose	Criteria and Definitions	Assessment	Conclusions
1. Check the unrestricted sprawl of large built-up areas	Would development of the Site lead to/constitute ribbon development?	No. The Site forms a distinct parcel which is well related to the existing settlement. The Site offers a logical rounding off of the settlement to the north west of Winwick.	The Site does not adjoin a large built-up area and provides for a logical option to extend the settlement edge of Winwick. The Site does not therefore serve to prevent unrestricted urban sprawl.
	Would development result in an isolated Site not connected to existing boundaries?	No. The Site adjoins the existing urban extent of Winwick.	
	Is the Site well connected to the built-up area? Does it have 2 or more boundaries with the existing built-up area?	Yes. The Site is bounded on two sides by existing developed parts of Winwick.	

Purpose	Criteria and Definitions	Assessment	Conclusions
	<p>Would development of the Site effectively "round off" the settlement pattern?</p>	<p>Yes. The Site would round off this part of Lymm reflecting the broad extent of the existing settlement to the north and west.</p>	
	<p>Do natural and physical features (major road, river etc) provide a good existing barrier between the existing development and undeveloped land, which if breached may set a precedent for unrestricted sprawl?</p>	<p>The Site is defined on two sides by existing urban form/road infrastructure. The third and final boundary is formed by an existing hedgerow which has the opportunity to be strengthened through the design process.</p>	
<p>2. Prevent neighbouring towns merging</p>	<p>Do natural features and infrastructure provide a good physical barrier or boundary to the Site that would ensure development was contained?</p>	<p>The Site is defined on two sides by existing urban form/road infrastructure. The third and final boundary is formed by an existing hedgerow which has the opportunity to be strengthened through the design process.</p>	<p>Development of the Site would not result in the merging of settlements.</p>
	<p>Would development of the Site lead to physical connection of two or more settlements?</p>	<p>No, the nearest settlement is Newton-Le-Willows which is located approximately 1.5km to the North West. There is no visual or perceptible connectivity between the two settlements given the extent of remaining open agricultural land, and intervening vegetation.</p>	
	<p>Would the development of the Site help preserve the physical separation of</p>	<p>Yes. The Parcel benefits from greater levels of enclosure from its surrounding features than potential alternatives</p>	

Purpose	Criteria and Definitions	Assessment	Conclusions
	settlements across the district?	adjacent to Winwick. The indicative capacity of 90 dwellings as set out in the Local Plan could be incorporated within the logical boundaries of the site without need for the creation of artificial boundaries to the settlement. The Parcel also would promote the coalescence of Winwick with the Warrington Urban Area as demonstrated by alternatives to the south of the settlement.	
3. Assist in safeguarding the Countryside from encroachment	Is there a strong, defensible boundary between the existing urban area and the Site – wall, river, main road etc (as opposed to garden boundaries)	Two existing roads provide the existing boundaries of the Site, and whilst it is acknowledged that these provide strong boundaries to the settlement as existing, an equally strong boundary could be created to the north/west of the Site allowing the sensitive rounding off of the existing settlement pattern.	The Site is acknowledged to fulfil a moderate role in this function, however can be developed to ensure that remaining agricultural land is safeguarded from development.
	Does the Site provide access to the countryside – footpaths, bridleways across the land, or is it designated park/green space?	No. The Site is in agricultural use and as such is not accessible to the public.	
	Does the Site include national or local nature conservation designation areas?	No. There are no designated ecological sites or sites of nature conservation within or adjacent to the Site.	

Purpose	Criteria and Definitions	Assessment	Conclusions
	Does the Site include areas of woodland, trees, hedgerow that are protected (protected ancient woodland) or significant unprotected tree/hedge cover?	There are no trees within the Site. Trees and hedgerow are concentrated towards the boundaries of the Site. The Site can be developed retaining the majority of these features save for access.	
	Does the Site includes any best and most versatile grade 1, 2, 3a (where known) agricultural land?	Unknown. Large parts of the Borough however are either Grade 2, 3a or 3b.	
	Does the Site contain buildings?	No.	
4. Preserve the setting and special character of historic towns.	Winwick is not recognised as a settlement of historical importance and as such the Green Belt is not considered to serve this purpose in this location. The Site is near the Parish Church of Winwick but due to thick existing vegetation there is very limited to no visual connectivity between the Site and the Church and the Site is not considered to form part of its setting.		Development of the Site would have no effect on the setting and special character of a historic town.
5. Assist in urban regeneration, by encouraging the recycling of urban/derelict land	N/A	No. The Site is promoted as a suitable Site for housing for Green Belt release to meet the future housing needs of Warrington. The Council has identified insufficient brownfield capacity to meet these needs. The release and allocation of this site would pick up this shortfall against identified needs and therefore will not conflict with the Council's regeneration strategy.	Development of the Site would not have any impact on the regeneration of the Borough.

Table 6 – Assessment of Land north of Hollins Lane, Winwick against Green Belt purposes

Position in relation to Council’s Assessment of Site

7.10 As identified in Sections 5 and 6 of this representation, our Client has concerns with the approach and methodology applied by the Council in the preparation of its Green Belt Assessment.

7.11 In relation to the Assessment undertaken for Hollins Lane, Winwick our Client agrees with the conclusions made for the following purposes:

➤ *Check the unrestricted sprawl of large built-up areas: No Contribution –*

This is on the basis that the Site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose. Further, the release of the Site would not lead to the unrestricted sprawl of Winwick given that the Site is well-contained by existing natural features and permanent infrastructure; and

➤ *Preserve the setting and special character of historic: No Contribution –*

The Site is not adjacent to a historic town. The Site does not cross an important viewpoint of the Parish Church.

7.8 Our Client continues to question the conclusions made for “*Preventing coalescence between two towns; safeguarding the countryside from encroachment; and assisting in urban regeneration*”.

7.9 We address each in turn below.

Preventing coalescence between two towns

7.10 In relation to coalescence, whilst it is acknowledged that the Site is situated between Winwick and Newton-Le-Willows, it is our position that existing topography and intervening vegetation means that there is an absence of any visual connection between the Site and Newton-Le-Willows, which is situated outwith the Borough in neighbouring St Helens. It is noted that the Site is not visible from Newton Road and as such its development would not result in the perception of Winwick expanding towards Newton-Le-Willows. The Site cannot and should not be considered to form part of an important settlement gap and its release would relieve pressure to development more sensitive sites around Winwick which do contribute towards this Green Belt purpose. It is considered that the Site makes “No Contribution” to this Green Belt purpose.

Safeguarding the countryside from encroachment

7.11 In relation to encroachment, it is accepted that the Site is currently open from development and forms a functioning part of the open countryside, and as such its development for housing would lead to the loss of the countryside. This is the case for

any Green Belt site and a position which has been accepted by the Council in the need for further housing land and the case for Green Belt release on a Borough-wide level. The release of this Site for development would provide for a logical rounding-off of the settlement in this location; to this end, the settlement boundary of Winwick should be amended as part of the Local Plan process in order to incorporate the former hospital to the south which has been redeveloped for housing (and which no longer needs to be designated as Green Belt land). This logical amendment in turn lends considerable support to the release and development of our Client's land interests as a logical rounding-off of Winwick settlement.

- 7.12 The release and development of the Site would not advance the built-up area of Winwick any further north or west than the existing extent of the settlement to the east. Only a single boundary of the Site current lacks definition, and there is the opportunity through the scheme design to create a new defensible western edge to the settlement utilising the route of the existing footpath as a means to define this which has been reflected in the proposed design of the scheme. Accordingly, our Client considers that the Site fulfils a "Moderate Contribution" when assessed against this Green Belt purpose.

Assisting in urban regeneration

- 7.13 In relation to urban regeneration, our Client objects to the conclusion that the Site has a "Moderate Contribution". The Council has undertaken an assessment of its considered urban capacity through the Plan preparation process and has concluded that there is an insufficient supply of available, deliverable, and achievable non-Green Belt land within the Borough on which to meet its identified housing requirement. As such, the exceptional circumstances required by national planning policy to review and release land from the Green Belt have been demonstrated. As a result, our Client considers that the Site makes "No Contribution" to this Green Belt purpose.

- 7.14 Taking into account the above, our Client considers that the conclusions of the Green Belt Assessment should be amended to conclude that the Site makes a Moderate Contribution to the Green Belt at the most, and therefore forms one of the most appropriate locations for Green Belt releases immediately adjoining the settlement boundary.

Summary of Site's Suitability for Development

- 7.15 The Site is capable of providing a logical extension to the settlement with clearly defined and durable boundaries. The development of this Site would not compromise the integrity of the surrounding landscape, moreover, as set out above, the development

would lessen development pressures elsewhere in the area in more sensitive locations, thus helping to preserve the openness of the Green Belt as a whole.

- 7.16 The Site is adjacent to the existing urban edge of Winwick, located to the north of Hollins Lane and west of Newton Road. The Site is well related to the existing settlement and would provide for a logical rounding off of Winwick in this location, with this northern and western boundary to the development reflecting the current extent of the built-up area of Winwick. It is clear from the Sustainability Assessment set out earlier in the Framework that the Site is located close to a number of existing facilities within Winwick.
- 7.17 The Site is accessible to a public transport route along Newton Road. Frequent Bus Services operate to Warrington Town Centre and Newton-Le-Willows where there is a wider range of services and employment opportunities. There are also further rail connections in both to Manchester and Liverpool.
- 7.18 The development of the Site will continue to provide an attractive and accessible residential area as well as to help safeguard and enhance the vitality and vibrancy of Winwick. The allocation of the Site will also assist the Council meet its wider housing needs which have been defined in response to latest evidence of demographic, affordable and economic needs.

Overall Conclusions from Green Belt Assessment in relation to the Site

- 7.19 National Planning Policy acknowledges that in order to fulfil housing requirements, a review of the Green Belt may be necessary. As shown within the Preferred Development Option Local Plan, the Council is clearly of the view that the circumstances of housing need and supply justify the need to review the Green Belt boundaries around Warrington.
- 7.20 Winwick is recognised by the Council as a sustainable settlement, and one which is both capable and in need of further housing growth. Due to the constrained nature of the settlement there will be a need to release land from the Green Belt in response to this context. The Site fulfils a limited role within the Green Belt, and is capable through careful design of safeguarding the countryside from encroachment. The Site will provide for a sustainable development and provide for a scale of growth which is appropriate for the Site and the wider settlement. The development of the Site will support the delivery of the Council's housing requirement, and with help maintain the vitality and vibrancy of Winwick.

8.0 CONCLUSIONS

8.1 The Warrington Local Plan sets out the strategic approach to development within the Borough between 2017 and 2037, and sets out a 20-year plan for the Borough.

8.2 Our Client, Miller Homes is supportive of the production of the Local Plan, and in general the overall approach taken by the Council in relation to the need to release Green Belt land to meet Warrington's overall housing requirements.

8.3 Notwithstanding this, our Client has a number of concerns with the Local Plan as drafted, and do not consider that in its current draft, that it can be found sound.

8.4 Our concerns with the Plan as drafted are:

- The Council should plan for a higher level of growth.
- The Plan does not fully take into account affordable housing needs, and a requirement of 1,000 dpa representing a 10% uplift to affordable housing provision to the OAN would be appropriate.
- There is an over-reliance on the amount of housing which will be delivered within the urban area particularly in relation to the strategic sites.
- Our Client has significant concerns regarding the availability and deliverability of urban sites within the Town Centre and the Waterfront area as well as the anticipated deliver rates for the South West Extension and Garden Suburb given the lead-in times for delivery and their proximity to one another.
- There is a need to increase the amount of housing proposed in the outlying settlements such as Winwick.
- There is a significant shortfall in the overall housing land supply. To ensure the Council meets their proposed housing requirement of 19,100 dwellings, land for an additional 1,944 dwellings need to be identified within the Local Plan. However, as set out above, the Council should seek to provide 10% flexibility in their supply to allow for non-implementation.
- Overall, the Council will, therefore, need to identify additional land to deliver 3,834 dwellings over the Plan period.
- Considering alternative scenarios, based on the LHNA upper limit of 19,100 dwellings (955dpa) with a 10% allowance for flexibility in the supply the Council would need to identify an additional 4,054 dwellings. Based on a higher uplift to 20,000 dwellings (1,000dpa) which includes a 10% uplift for affordable housing

the Council would need to identify an additional 5,044 dwellings over the Plan period with a 10% allowance for flexibility in the supply.

- There is an urgent need for the Council to allocate additional land within the Local Plan, which is suitable, available and deliverable and will help to meet the housing needs of the Borough. Considering our concerns regarding the deliverability of urban sites within the Town Centre and at the Waterfront, the Council needs to consider the release of further Green Belt sites to deliver lower density family housing.
- 1,288 dwellings should be removed from this supply resulting in an overall five-year supply of 2,844 dwellings. The removal of 2,844 dwellings from the first five years of the Plan will result in the delivery of these dwellings being pushed back towards the middle and end of the Plan period. This has potentially serious implications for the Council in meeting their short-term housing needs as well as maintaining a five-year housing land supply particularly given the stepped approach to housing delivery. As such, alongside a robust mechanism to secure a review of the Plan every five years, the Council needs to allocate additional land within the Warrington Local Plan, which is suitable, available and deliverable in the short-term to ensure these needs are met.
- It is our position that our Client's land interests at Hollins Lane, Winwick is the most suitable and sustainable site for development within Winwick.

8.5 On the basis of the above, our Client has concerns with the Plan as drafted and object to the proposed spatial strategy and related policies, and do not consider it to be sound on the basis that it fails to meet the tests set out in Paragraph 35 of the NPPF.

Appendix 1 – Site Layout Plan



House Type	Beds	No	SQ Ft	Total Sqft	%	Required %
Apartment	2B3P	36	555	19980		22
203C	2B4P	17	737	12529		10
303C	3B5P	13	819	10647		8
304N	3B5P	16	831	13296		10
305T	3B5P	9	869	7821		5
308M	3B5P	12	972	11664		7
403N	4B7P	6	999	5994		4
405N	4B6P	6	1045	6270		4
408C	4B7P	10	1178	11780		6
409M	4B7P	2	1219	2438		1
411N	4B8P	3	1269	6345		3
412M	4B7P	15	1297	19455		9
414M	4B8P	7	1342	9394		4
416N	4B8P	11	1400	15400		7
Total		165		153013		100
% 2Bed	2B					32.1
% 3Bed	3B					30.3
% 4Bed	4B					37.6
Dwellings per Hectare		38.64				

developable area 4.27 hectares

Appendix 2 – Development Plan Framework Document

LAND NORTH OF HOLLINS LANE, WINWICK

DEVELOPMENT
FRAMEWORK



SEPTEMBER 2017

**BARTON
WILLMORE**

millerhomes

EXECUTIVE SUMMARY AND CONTENTS

This Development Framework has been prepared by Barton Willmore on behalf of Miller Homes. It demonstrates how land north of Hollins Lane, Winwick, Warrington (the Site) represents a sustainable location for a new residential development to meet the future housing needs of Warrington Borough.

Warrington Borough Council is currently preparing a new Local Plan which will set out planning policies and preferred sites to guide future development in the Borough. The Council acknowledges that greenfield land will be required to meet future development needs including those areas which are currently designated as Green Belt.

The Site is located to the west of Winwick and is currently designated as Green Belt. At this time, Winwick is significantly constrained by the wider Green Belt. However, given the need to release Green Belt land across the Borough, we consider that the Site, by virtue of its limited contribution towards the Green Belt, can be developed without harming the overall integrity of the Green Belt to the west of Winwick.

Winwick is identified as an Outlying Settlement within the emerging Warrington Local Plan, one of six settlements identified as housing capacity to accommodate future development within the Green Belt. Accordingly, this document demonstrates how the Site can contribute towards a sustainable extension to Winwick, boosting and securing housing delivery in response to local and wider needs. It demonstrates how the Site occupies a sustainable and accessible location, with the potential to help strengthen local pedestrian and cycling routes, delivering improvements in local sustainable accessibility.

This document presents an Concept Masterplan and supporting design principles to demonstrate our Client's emerging design rationale for the Site. This has been informed by an initial assessment process of the Site and its surrounds to demonstrates the ability of the Site to accommodate approximately 120 dwellings, alongside improved pedestrian and cycle links and public open space.

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A49

M6

WINWICK

Hollins Lane

Hollins Park Hospital

A24

M62

SITE LOCATION AND DESCRIPTION

SITE LOCATION

The Site lies to the west of Winwick, within the administrative area of Warrington. The Site is located approximately 1.5km from Junction 22 of the M6 and c.1km Junction 9 of the M62. Warrington Town Centre is c.5km to the south and is directly accessible via the A49.

SITE DESCRIPTION

The Site comprises an agricultural field to the north of Hollins Lane and to the east of Newton Road. It extends to an area of c.7.2 hectares and slopes gradually from north-east to south-west.

The Site is framed to the east and south by existing highway infrastructure, dominant landscape features and existing residential development. The eastern boundary is defined by established trees and scrub planting, beyond which lies the A49 (Newton Road) and residential development comprising large properties set within generous plots. The southern boundary is defined by an established hawthorn hedgerow and mature trees. Hollins Lane runs adjacent to the southern boundary, with 19th Century terraced residential properties overlooking the Site. To the rear of these properties is an area of more recently built residential development and Hollins Park Hospital, which extends the settlement south towards the M62.

To the west and north-west of the Site lies open farmland. The western boundary includes a group of established trees and the northern boundary is framed by mature trees and several residential dwellings (Cop Holt Cottages and Newton Road Cottages). An existing Public Right of Way runs adjacent to the western and northern boundary, providing access to nearby residential development and the surrounding open countryside.

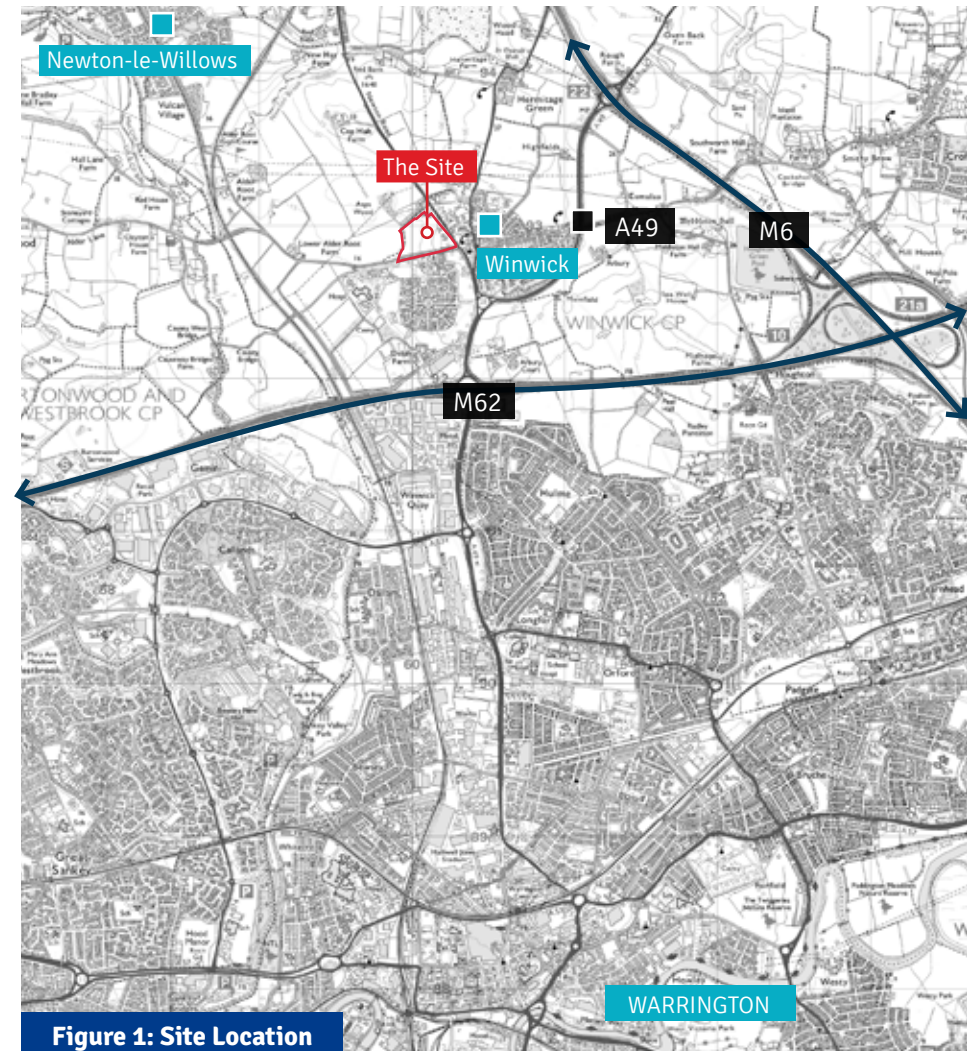


Figure 1: Site Location

— Site Boundary



A49 (Newton Rd)

Newton Rd Cottages

Cop Holt Cottage

WINWICK

Hollins Lane

Winwick Link Rd

Hollins Park Hospital

A24

Elysium Healthcare

M62

WINWICK QUAY

HULME

LONGFORD

Figure 2: Site Aerial

GREEN BELT ASSESSMENT

SITE DESCRIPTION

The Warrington Green Belt is contiguous with the Merseyside, Greater Manchester, and North Cheshire Green Belts. Winwick is a free standing, sustainable settlement located to the north of the Warrington Urban Area and North of the M62. The Green Belt at Winwick wraps tightly around the Settlement, closely following the settlement boundary as defined within the Warrington Core Strategy. The settlement, as with all other rural parts of the Borough, is tightly constrained by the Green Belt.

Warrington Borough Council has recently commenced the preparation of a new Local Plan which will define the future development requirements of the plan area and identify the strategy to secure its delivery. The Local Plan is underpinned by updated evidence which suggests a significant uplift in housing need and subsequently an urgency for further development sites. The Council's assessment of its land capacity has shown a shortage of available, deliverable and achievable non-green belt land in contrast to identified requirement, necessitating the need for a review and release of land from the Green Belt for development.

In October 2016 the Council published a Green Belt Assessment which assessed identified land parcels for their contribution to the Green Belt with reference to the five purposes of the Green Belt as defined under

Paragraph 80 of the NPPF. This review has since been updated in response to Call for Sites submissions through the July 2017 update. The Site is assessed through the former under Site reference W13, adopting the same site boundary as that promoted through this Development Framework.

The Council's Green Belt Assessment concludes that the Site makes a Strong Contribution to the Green Belt. This is on the basis that the Site is adjudged to support a strong degree of openness and not all boundaries between the parcel and the countryside are durable. As a result the Site is considered to fulfil a strong role in preventing encroachment into the countryside and is therefore concluded to have a strong contribution to the fundamental aim of the Green Belt under Paragraph 79 of the NPPF.

We disagree with the conclusions of the Green Belt Assessment. This is because the Assessment fails to take into account the opportunity provided through the development of the Site to provide for a new durable but natural boundary to the settlement edge to the north and west of the Site, which reflects that of the wider settlement, and which would provide for a logical and well related rounding off of the settlement. The scale of the Site means that it is better suited to accommodating the level of growth sought by the Council at Winwick through its Preferred Development Option

Consultation Document without needing to create protracted artificial boundaries to the settlement.

Examining the Council's conclusions on each of the five Green Belt purposes, it is agreed that:

- The Site fulfils no contribution to check the sprawl of urban areas; and
- The Site fulfils no contribution to the setting of historic towns.

We disagree that Site plays a weak role in preventing the coalescence of two towns, and consider it to play no role. Although the Site is acknowledged to sit within the existing gap between Winwick and Newton-le-Willows, due to local topography and intervening vegetation there is an absence of a visual or perceptive connection between the Site and Newton-le-Willows. The Site would not therefore be considered to form as part of an important settlement gap, and its release for development would override the pressure to development more sensitive land to this purpose which is located to the south of Winwick and close to the Warrington Urban Area.

Whilst it is acknowledged that the Site fulfils a role in preventing encroachment into the open countryside – given its open nature – we disagree that this is a strong role taking into account the wider settlement pattern and relative contained nature of the Site. It is

considered that the development of the Site would not lead to further pressures for Green Belt release in this location.

We dispute the assessment that the Site fulfils a moderate contribution to assisting in urban regeneration. This is based on the conclusion made by the Council that there is an insufficient supply of available, deliverable and achievable brownfield land within the Borough to meet its assessed housing needs. The significance of this housing need, together with the constrained nature of the Borough, necessitates the need for Green Belt release. No sites should therefore be found to fulfil this Green Belt purpose.

Whilst the Site clearly makes a contribution to the openness and function of the Green Belt, we consider that function is limited by the factors above. When considered in the context of the Green Belt as a whole, the need for Green Belt release within the Borough, and the need to support a sustainable pattern of development, we consider that the Site provides for the best opportunity to deliver a sustainable, high quality and sensitive expansion to the existing settlement at Winwick. As with any settlement which is tightly constrained by Green Belt, the encroachment of the countryside is an inevitability of the release of undeveloped land for residential development. We consider that the Site provides a logical extension to the settlement

which will allow for a sensible rounding off of Winwick, and will not encourage the further expansion of the settlement in this location in the future. The Site therefore is suitable for release from the Green Belt as a potential housing allocation.

PURPOSE	CRITERIA AND DEFINITIONS	ASSESSMENT	CONCLUSIONS
1. Check the unrestricted sprawl of large built-up areas	Would development of the Site lead to / constitute ribbon development?	No. The Site forms a distinct parcel which is well related to the existing settlement. The Site offers a logical rounding off of the settlement to the north west of Winwick.	The Site does not adjoin a large built-up area and provides for a logical option to extend the settlement edge of Winwick. The Site does not therefore serve to prevent unrestricted urban sprawl.
	Would development result in an isolated development Site not connected to existing boundaries?	No. The Site adjoins the existing urban extent of Winwick.	
	Is the Site well connected to the built-up area? Does it have 2 or more boundaries with the existing built-up area?	Yes. The Site is bounded on two sides by existing developed parts of Winwick.	
	Would development of the Site effectively 'round off' the settlement pattern?	Yes. The Site would round off this part of Winwick reflecting the broad extent of the existing settlement to the north and west.	
	Do natural and physical features (major road, river etc.) provide a good existing barrier between the existing development and undeveloped land, which if breached may set a precedent for unrestricted sprawl?	The Site is defined on two sides by existing urban form/ road infrastructure. The third and final boundary is formed by an existing hedgerow which has the opportunity to be strengthened through the design process.	
2. Prevent neighbouring towns from merging	Do natural features and infrastructure provide a good physical barrier or boundary to the Site that would ensure development was contained?	The Site is defined on two sides by existing urban form/ road infrastructure. The third and final boundary is formed by an existing hedgerow which has the opportunity to be strengthened through the design process.	Development of the Site would not result in the merging of settlements.
	Would development of the Site lead to physical connection of two or more settlements?	No the nearest settlement is Newton-Le-Willows which is located approximately 1.5km to the North West. There is no visual or perceptible connectivity between the two settlements given the extent of remaining open agricultural land, and intervening vegetation.	
	Would the development of the Site help preserve the physical separation of settlements across the district?	Yes, the Site benefits from greater levels of enclosure from its surrounding features than potential alternatives adjacent to Winwick. The indicative capacity of 90 dwellings as set out in the Local Plan could be incorporated within the logical boundaries of the Site without need for the creation of artificial boundaries to the settlement. The Parcel also would promote the coalescence of Winwick with the Warrington Urban Area as demonstrated by alternatives to the south of the settlement.	

Table 1 : Green Belt Assessment Table

PURPOSE	CRITERIA AND DEFINITIONS	ASSESSMENT	CONCLUSIONS
3. Assist in safeguarding the countryside from encroachment	Is there a strong, defensible boundary between the existing urban area and the Site – wall, river, main road etc (as opposed to garden boundaries)?	Two existing roads provide the existing boundaries of the Site, and whilst it is acknowledged that these provide strong boundaries to the settlement as existing, an equally strong boundary could be created to the north/west of the Site allowing the sensitive rounding off of the existing settlement pattern.	The Site is acknowledged to fulfil a moderate role in this function, however can be developed to ensure that remaining agricultural land is safeguarded from development.
	Does the site provide access to the countryside – footpaths, bridleways across the land, or it is designated park / green space?	A public right of way runs within the western boundary of the Site. Notwithstanding the presence of this footpath, the majority of the Site is in agricultural use and as such is not accessible to the public.	
	Does the site include national or local nature conservation designation areas?	No. There are no designated ecological sites or sites of nature conservation within or adjacent to the Site.	
	Does the site include areas of woodland, trees, hedgerow that are protected (protected ancient woodland) or significant unprotected tree / hedge cover?	There are no trees within the Site. Trees and hedgerow are concentrated towards the boundaries of the Site. The Site can be developed retaining the majority of these features save for access.	
	Does the Site include any best and most versatile grade 1,2,3a (where known) agricultural land?	Unknown. Large parts of the Borough however are either Grade 2, 3a or 3b.	
	Does the Site contain buildings?	No.	
4. Preserve the setting and special character of historic towns	Winwick is not recognised as a settlement of historical importance and as such the Green Belt is not considered to serve this purpose in this location. The Site is near the Parish Church of Winwick but due to thick existing vegetation there is very limited to no visual connectivity between the Site and the Church and the Site is not considered to form part of its setting.	Development of the Site would have no effect on the setting and special character of a historic town.	
5. Assist in urban regeneration, by encouraging the recycling or urban / derelict land	N/A	No. The Site is promoted as a suitable Site for housing for Green Belt release to meet the future housing needs of Warrington. The Council has identified insufficient brownfield capacity to meet these needs. The release and allocation of this Site would help to address this shortfall against identified needs, and this will not conflict with the Council's regeneration strategy.	Development of the Site would not have any impact on the regeneration of the Borough.

As set out within this Development Framework, the Site is capable of providing a logical extension to the settlement with clearly defined and durable boundaries. The development of this Site would not compromise the integrity of the surrounding landscape. Moreover, as set out above, the development would lessen Greenbelt pressures elsewhere in the Borough in more sensitive locations, thus helping to preserve the openness of the Green Belt as a whole.

The Site is adjacent to the existing urban edge of Winwick, located to the north of Hollins Lane and west of Newton Road. The Site is well related to the existing settlement and would provide for a logical rounding off of Winwick in this location, with northern and western boundaries to the development reflecting the current extent of the built up area of Winwick. It is clear from the Sustainability Assessment set out earlier in this document that the Site is located close to a number of existing facilities within Winwick.

The Site is accessible to a public transport route along Newton Road. Frequent bus services operate to Warrington Town Centre and Newton-Le-Willows where there is a wider range of services and employment opportunities. There are also further rail connections in both to Manchester and Liverpool settlements.

The development of the Site will provide for an attractive and accessible residential area as well as to help safeguard and enhance the vitality and vibrancy of Winwick. The allocation of the Site will also assist the Council in meeting its wider housing needs which have been defined in response to latest evidence of demographic, affordable and economic needs.

OVERALL CONCLUSIONS FROM GREEN BELT ASSESSMENT

National Planning Policy acknowledges that in order to fulfil housing requirements, a review of the Green Belt may be necessary. As shown within the recent Preferred Development Options Local Plan, the Council is clearly of the view that the circumstances of housing need and supply justify the need to review Green Belt boundaries around Warrington.

Winwick is recognised by the Council as a sustainable settlement, and one which is both capable and in need of further housing growth. Due to the constrained nature of the settlement there will be a need to release land from the Green Belt in response to this context.

Clearly, preference should be given to those sites that no longer meet at least one of the five purposes for its inclusion within the Green Belt as defined at paragraph 80 of the NPPF. As should the requirement to provide for a sustainable pattern of development, and identify sites which respond to the scale of growth sought by the Council at each settlement.

Our assessment shows that the Site fulfils a moderate role within the Green Belt, and is capable through careful design of safeguarding the countryside from encroachment. The Site will provide for a sustainable development and a scale of growth which is appropriate for the Site and wider settlement. The development will support the delivery of the Council's housing requirement, and will help maintain the vitality and vibrancy of Winwick.

We welcome further discussions with the Council regarding the assessment of this Site.



NEIGHBOURHOOD

The Site is well related to the built up area of Winwick and is sustainably located in close proximity to Winwick Village Centre. Winwick is identified as an Outlying Settlement within the emerging Warrington Local Plan. Warrington Town Centre is within 5km of the settlement and is accessible to the Site by public transport. The Site therefore occupies a sustainable and suitable location for new development.

Figure 3 opposite demonstrates that a significant proportion of facilities and public transport opportunities are within a convenient walking and cycling distance from the Site.

FACILITIES

The Site is well located in relation to a range of local services and amenities. These include but are not limited to:

- St Oswald CofE Church;
- Hollins Park Hospital;
- Winwick CofE Primary School;
- Winwick Leisure Centre;
- The Cheshire day nursery;
- The Swan (Public House);
- Premier Inn;
- Bliss Books;
- B&Q;
- St Oswalds House Care Home.

EMPLOYMENT

Winwick Quay Business Park is located approximately 1km to the south of the Site, just beyond the M62. This area is characterised by light industrial uses and medium size offices. Notable employers include AAH Pharmaceuticals and Royal Mail.

This Business Park lies within the wider area of Hulme (Warrington) which also includes a greater range of employment opportunities including several large retail units and a range of commercial businesses. Beyond Hulme to the south lies Longford and Warrington Town Centre where a more significant range of employment opportunities can be accessed.

EXISTING ROAD NETWORK

The Site is accessible from Hollins Lane and the A49 (Newton Road). Hollins Lane provides access to the south of the Site, and the A49 to the east of the Site. Accordingly, the Site is well connected by the existing road network with access via the A49 and Winick Link Road to the M6 and M62, connecting Winwick to major cities including Manchester and Liverpool.

SUSTAINABLE TRANSPORT

The Site benefits from access to public transport in the form of existing bus stops /services directly adjacent to the Site on Hollins Lane and Norton Road. Regular daily connections are available from these bus stops include Bus Services 22, 22E, 24E, 75,

360, 329. In addition, bus stops served by Bus Service 19 also lie within easy walking distance of the Site on Myddleton Lane.

Bus Services 360, 329, 19, 22 are alternating services and generally provide 7 services per hour from the morning until early evening with a similar frequency on a Saturday. Destinations including Warrington Town Centre to the south and Newton-le-Willows to the north. Bus Services 22E and 24E are evening services that operate through Winwick until 11pm between Newton-le-Willows and Warrington.

Onward travel via public transport is available via bus connection to Warrington Station which is located on the national rail network providing links to major towns and cities across the region such as Manchester and Liverpool.

WALKING AND CYCLING

Ladies' Walk is a Public Right of Way that provides access across the Site from Hollins Lane to Newton Road. The Site also benefits from convenient access to the surrounding countryside to the west.



1. St Oswald CofE Church



2. Hollins Park Hospital



3. Wiwick CofE Primary School



4. Wiwick Leisure Centre

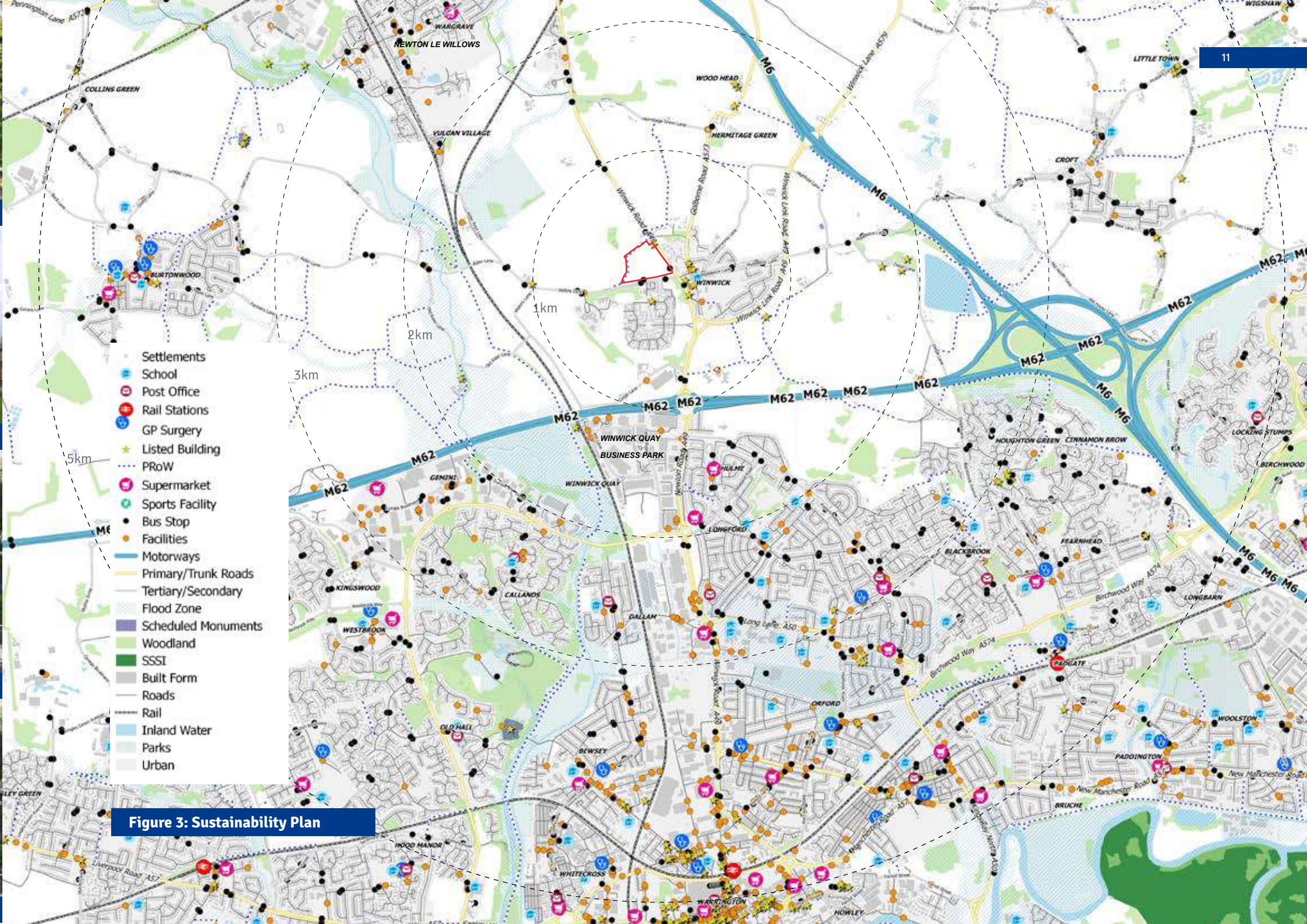


Figure 3: Sustainability Plan

TOWNSCAPE CHARACTER

Winwick exhibits a varied residential character which is reflective of the manner in which settlement growth has occurred over a series of historic phases.

The historical settlement area of Winwick is largely located to the east of the Site and typically comprises of large early 1800s agricultural worker’s cottages and farmhouses (image 1 & 2).

The main village high street (Goulbourne Road) is characterised by a series of cottages and community facilities (image 3). New housing development has expanded north of Goulbourne Road along Spire Gardens, comprising large detached and semi-detached properties characterised by red brick and rendered facades with grey roof tiles (image 4).

Further east of the Site is a series of Victorian red brick terrace houses on Myddleton Lane (image 5) and beyond is an area of 1950s and 1960s Post-War semi-detached red brick housing (image 6).

South-east of the Site is an area of 1970s bungalow housing served of Faringdon Road (image 7, 8 & 9). These properties are characterised by brown/red brick, weatherboard cladding, grey roof tiles and the occasional built in attic rooms.

South and overlooking the Site on Hollins Lane are a series of victorian red brick terrace houses with ground floor bay windows. The front gardens feature old victorian lamp posts (image 10).

Further south of the Site is a modern medium density residential estate. This replaced the former Winwick Hospital mental asylum which was closed in 1997. The housing estate has a distinctive layout which was influenced by the layout of the former hospital buildings, many of which were demolished to make way for the new housing estate. The Estate is characterised by a mix of house types including large 4-5 bedroom detached and semi-detached houses designed in a contemporary georgian architectural style (image 11, 12) and 3-4 bedroom semi-detached and detached red brick houses (image 13). At the centre of this development is a formal landscaped square surrounded by hedgerows (image 14). The former hospital recreational grounds have been retained as a large public park surrounding the housing development (image 15).

North east of the Site, at the edge of Goulbourne Road, are a series of new bespoke designed private detached houses set within generous plots (image 16).



Figure 4: Photograph Location Map



OPPORTUNITIES AND CONSIDERATIONS

In order to guide the emerging design vision and Concept Masterplan for the Site, an initial site assessment has been undertaken to identify a series of opportunities and considerations.

CONSIDERATIONS

- Ensure the new street network and development plots respond to the existing Site topography whilst minimising ground remodelling.
- Retain and integrate existing landscape features adjacent to the Site boundaries including existing trees and hedgerows along the Site boundary.
- Consider a range of house types across the Site to reflect the local character housing in the area.
- Consider traffic management across the Site through the design of a legible street hierarchy.
- Retain and integrate existing PRow in the design.
- Consider the provision of public open spaces on Site to aid orientation and movement across the Site.

OPPORTUNITIES

- Integrate landscape features of value into the landscape framework capable of supporting and enhancing the biodiversity through the provision of rich planting.
- Enhance the amenity, ecological and arboricultural value of the existing trees within the Site.
- Provide new vehicle access into Site from Hollins Lane.
- Retain and enhance the PRow along the west and north edge of the Site boundary.
- Provide high-quality housing set within an attractive landscape setting to soften the proposed built form.
- Enhance the appearance of the urban edge through the inclusion of new planting within and at the edge of the proposed development.
- Provide direct pedestrian and cycle connections to existing bus stops located on Hollins Lane and Newton Road (A49).
- Increase scope for more sustainable transport opportunities, including walking and cycling.
- Provide a SuDS that works with the existing topography and change in levels on Site.
- Provision of parkland surrounding the Site.

KEY

- Site Boundary
- ↗ Existing Vehicle Access
- ↘ Potential Vehicle Access
- ↙ Existing Pedestrian Access
- - - PRow
- 40mph Speed Limit Road
- Trees
- Hedgerow
- ✪ Existing Pond (outwith Site)
- ✪ Potential Drainage Pond
- Existing Drainage Ditch
- Contours
- Bus Stops
- ✪ Listed Buildings

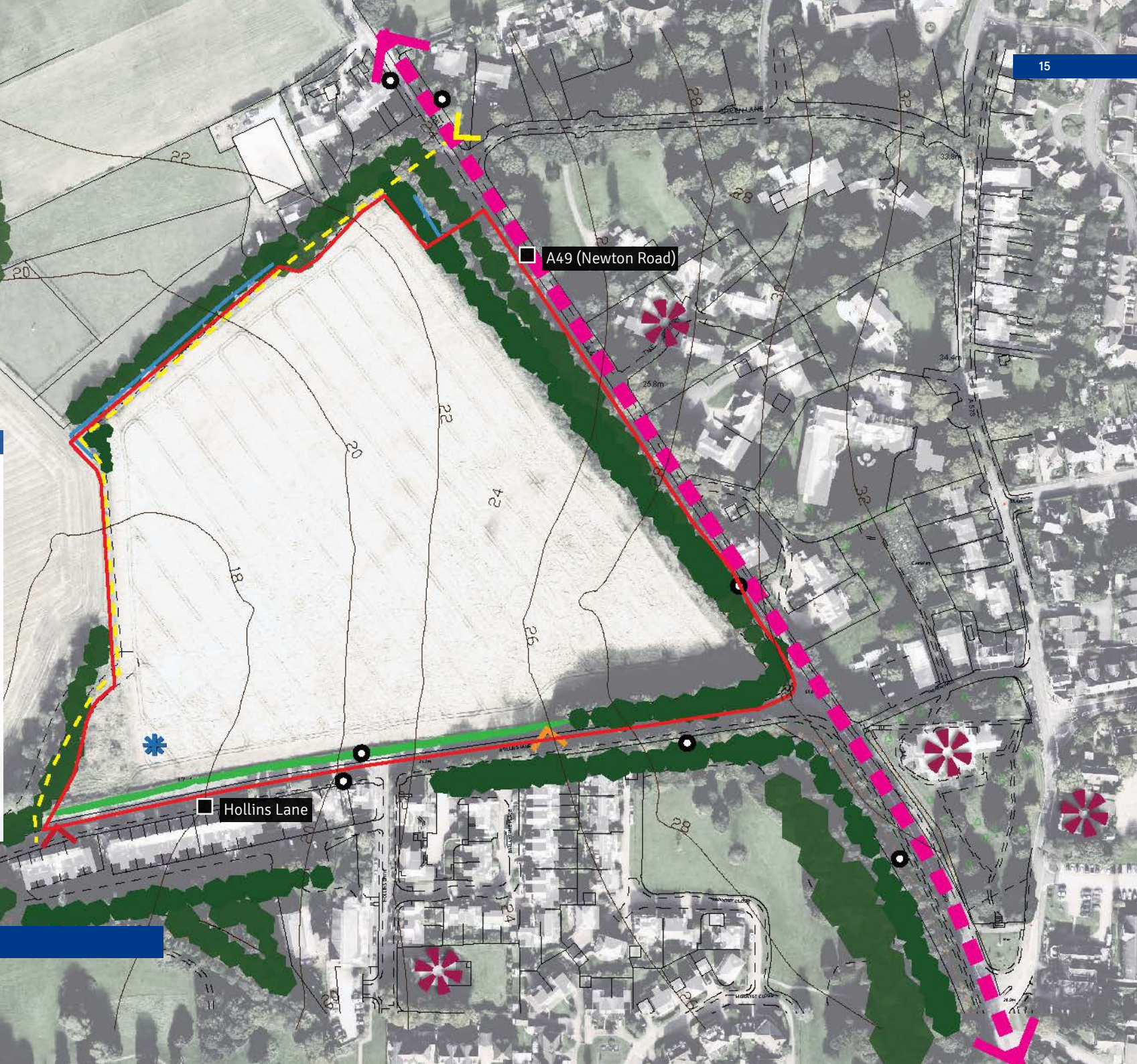


Figure 5: Site Assessment Plan

DESIGN VISION AND EMERGING PROPOSALS

DESIGN VISION

The vision for the Site is to:

- Create an attractive and high quality residential neighbourhood which responds positively to its landscape and urban contexts and respects the character of Winwick.
- To create an integrated and accessible new movement network which strengthens existing connections, offers choice and promotes sustainable modes of travel.
- To create a walkable neighbourhood which is legible and easy to move around in, providing strong linkages to access local amenities, existing residential areas and new green infrastructure.
- To provide the right ingredients for a balanced and sociable residential community comprising around 120 dwellings of varying types, sizes and densities.
- To create imaginatively designed homes with gardens which have easy access to a range of amenities including children's play and landscaped green space.
- To create a place which enhances the natural environment and character of the Site, providing a comprehensive and fully inter-connected network of green infrastructure.

DEVELOPMENT QUANTUM

Taking into account the location of the Site and the density of existing and committed residential development, an average density of 30 dwellings per net hectare has initially been applied. This preliminary assessment will be reviewed as discussions with the Council progress.

The proposed density allows for the creation of a sustainable and balanced residential development, comprising a mix of housing types, sizes and tenures.

Based on an average net density of 30 dwellings per net hectare, the proposed development quantum is anticipated to be in the region of 120no. dwellings.

The opportunities and considerations previously presented have informed key design principles that have been integrated into the design of a Concept Masterplan.

DESIGN PRINCIPLES

The opportunities and considerations previously presented have informed key design principles that have been integrated into the design of a Concept Masterplan.

1. **Development blocks** will be positioned in response to the Site topography.
2. **Existing landscape features** will be retained and incorporated into a green infrastructure network. This will create a setting and identity for the new development, whilst providing increased biodiversity, recreation opportunities and landscape visual mitigation.
3. **A range of house types** will be provided across the Site.
4. **New streets** will be designed to prioritise pedestrians whilst creating a clear road layout for vehicles.
5. **Pedestrian and cycle connections** that connect with the surrounding area and public transport network will be provided throughout the development and within areas of public open space.
6. **Provision of a new circular park around the development, reflective of the parkland to the south** to aid orientation, link and enhance PRow and provide an attractive, functional and accessible place for leisure and recreation.

7. **Provision of incidental green spaces** to address Site topography and strengthen the legibility of pedestrian access points into the Site.
8. **Vehicular access** to the Site will be delivered from Hollins Lane.
9. **Sustainable drainage features** including swales and attenuation ponds will be located in response to Site topography and existing drainage patterns.
10. **Consideration of western boundary treatment** and softening of settlement edge.



KEY

- Site Boundary
- Indicative Development Plots
- Landscape
- Potential Drainage Pond
- Potential Primary Vehicle Routes
- Potential Pedestrian / Cycle Route
- PRoW
- Pedestrian Access
- Potential Vehicle Access
- Existing Bus Stops
- Listed Buildings

Figure 6: Concept Masterplan

BENEFITS AND CONCLUSION

BENEFITS

The Site represents an available, suitable and sustainable Site, having regard to the following benefits:

- The development of the Site will provide a mix of high quality housing for the local area and wider Borough.
- The provision of new housing will help drive forward Warrington Borough Council's objective to supporting population growth across the Borough.
- The Site is considered to make no more than a moderate contribution to the Green Belt.
- The Site has the potential to deliver a valuable contribution towards supporting the local economy.
- The Site provides an opportunity to enhance and improve existing public rights of way.
- The Site occupies a sustainable location for new housing, within easy access to public transport opportunities on both Hollins Lane and Newton Road.
- The Site has the potential to secure safe vehicular access along Hollins Lane, without having an unacceptable impact on the local highway network.
- There is the opportunity to create integrated pedestrian and cycle linkages as part of the Site's development, linking to existing bus stops adjacent to the Site, encouraging alternative modes of transport to the private car and will contribute towards a low-carbon community.
- The Site has the potential to provide a new Park which will provide an attractive setting for residents and the wider community whilst aiding orientation and providing opportunities for leisure and recreation.
- Any development will be set within a strong landscape framework which will assist in absorbing the proposed development into the surrounding landscape character.
- The Concept Masterplan for the Site has taken full account of local landscape and nature conservation interest.
- Any development will retain and enhance existing land features and this will be strengthened through the implementation of new soft landscaping at the edges of and within the Site.





CONCLUSION

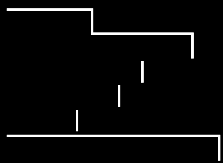
This Development Framework has undertaken an assessment of the Site, its context and its development potential. In doing so, it has been demonstrated that there are sound planning and design reasons for the Site to be allocated for future housing growth.

In conclusion, the Site represents a logical extension to existing resident development in Winwick, is available, and offers a suitable location to help meet Warrington Borough's short and longer term housing needs.

Next Steps

The Site is considered deliverable and could start to deliver within the next five years and Miller Homes are committed to progressing the emerging Concept Masterplan towards a high quality residential development that responds to the local housing need, whilst taking into account and reflecting the character of the surrounding settlement.

We look forward to working with Warrington Borough Council to progress the proposals for the Site, and welcome any feedback and/or the opportunity to meet and discuss.



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Appendix 3 - Housing Supply Table



SITE SPECIFIC HOUSING LAND SUPPLY ASSESSMENT (AT JUNE 2019)


TABLE 1: TOWN CENTRE SUPPLY



Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
STADIUM QUARTER						
A20 (UCS) 1401 (SHLAA ¹)	Land at Winwick Street, Warrington WA2 7NG	Mixed use	200 (UCS) 20 (SHLAA)	No planning permission	<p>Our Client does not dispute that this site is potentially suitable, available and deliverable over the Plan period given the site has previously benefited from consent for a mixed-use development. However, our Client questions whether the site has the capacity to deliver 200 dwellings.</p> <p>The trajectory at Appendix 2 of the UCS confirms this figure is based on 82% of the site being developed for housing at a density of 140dpa. Whilst we do not disagree with assumed density, the Land Use Plan that accompanies the UCS and the SHLAA confirm that this parcel is intended to come forward as a mixed-use development plot. As such, the percentage of the site to be developed for residential purposes is likely to be a lot lower than that stated in the UCS.</p> <p>The SHLAA states that as part of a mixed-use scheme the site is expected to deliver 20 dwellings over the Plan period. Based on this evidence and the Council's future intentions for the site, 180 dwellings should, therefore, be removed from the overall supply.</p>	
A26 (UCS)	Land bounded by Haydock Street, John Street and Winwick Street, Warrington	Mixed use – offices, retail and cultural centre	35 (UCS)	No planning permission	<p>The UCS claims that this site will deliver 35 dwellings within the first five years of the Plan period. The site is not available now, does not benefit from planning permission for housing and has not been identified as being suitable for housing as part of the SHLAA.</p> <p>The two-storey building in the south west corner of the site is also Grade II Listed. The NPPF gives great weight to the conservation of designated heritage assets and the loss of a Grade II Listed building should only be allowed in exceptional circumstances. The Council has not provided any evidence to justify that such circumstances exist to demolish the building for housing.</p> <p>Moreover, the Council has not presented any evidence to demonstrate that there are reasonable prospects that housing will be delivered on the site within the next five years or that it will become available over the Plan period. There is no developer interest in the site and there is no evidence to suggest that the Council intends to impose a compulsory purchase order to acquire the site for housing development. As such, the site should not be included within the housing land supply because it does not meet the definition of 'deliverable' or 'developable' set out within the NPPF. 35 dwellings should, therefore, be removed from the</p>	

¹ Strategic Housing Land Availability Assessment (2018)

Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
					five year supply as well as the overall supply.	
BRIDGE STREET QUARTER						
B2 (UCS)	Land bound by Academy Street, Academy Way, Bank Street, Moulders Lane, Bridge street, Union Street and Horrocks Lane, Warrington	Under construction	62 (UCS)	Planning permission granted in December 2014 for a mixed-use development (ref. 2014/24473)	<p>The UCS identifies this site as delivering 62 dwellings in the first five years of the Plan period. However, Muse alongside WBC are currently developing this site for the mixed-use scheme approved as part of application ref 2014/24473. The development includes:</p> <ul style="list-style-type: none"> • A new market hall • Class A1 retail uses • Class A2 financial and professional services uses • Class A3 restaurants and cafes • Class B1 office uses including a new council office building • Class D1 non-residential uses including a library • Class D2 leisure uses including a cinema <p>The planning permission does not include any provision for housing and there have been no subsequent planning applications on the site for this use. Furthermore, the Council has not assessed this site as part of their SHLAA or provided any alternative evidence to demonstrate that there is a realistic prospect that housing will be delivered on the site within five years. As such, the site does not meet the definition of deliverable set out in the NPPF and 62 dwellings should be removed from the five year supply and overall supply.</p>	
COCKHEDGE QUARTER						
C1 (UCS)	Land bound by Scotland Road, Winwick Street and Crown Street, Warrington	Retail	160 (UCS)	No planning permission	<p>This parcel currently comprises three Grade II Listed Buildings – the National Westminster Bank, 3 and 5 Winwick Street and the Theatre Tavern. Whilst the buildings could all potentially become available in the future, at three storeys in height the size of the existing buildings are not suitable to accommodate 160 dwellings. The land available for development on the site is also limited and the existing buildings would need to be demolished to accommodate the anticipated level of development.</p> <p>The NPPF gives great weight to the conservation of designated heritage assets and the loss of a Grade II Listed Building should only be allowed in exceptional circumstances. The Council has not provided any evidence to justify that such circumstances exist to deliver the anticipated number of dwellings. The demolition of the buildings is, therefore, highly unlikely to be an option moving forward.</p> <p>Furthermore, the site does not benefit from planning permission for housing and has not been considered as part of the Council's SHLAA. The buildings have a commercial use and are within the ownership of multiple private landowners. There is no evidence to demonstrate there is developable interest in the site or that the buildings are suitable to be converted in residential</p>	

Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
					accommodation. As such, the site does not meet the NPPF definition of developable and 160 dwellings should be removed from the overall supply.	
C2, C7 and C8 (UCS)	Cockhedge Shopping Park, Scotland Road, Warrington	Bingo, retail units and associated car park	220 (UCS)	No planning permission	<p>The UCS claims that these three parcels will start to deliver dwellings in 2027/28. Whilst the site could potentially be suitable for housing in the future, the site not currently available given it is occupied by a bingo hall, retail units and associated car park.</p> <p>The private landowner, who controls Cockhedge Shopping Park, is not promoting the site for redevelopment through the Local Plan process, the site does not benefit from planning permission for housing and the Council has not presented any evidence in the SHLAA to demonstrate that:</p> <ul style="list-style-type: none"> • There are reasonable prospects that it will become available over the Plan period; • That there is developer interest in the site; and • That the Council intends is impose a compulsory purchase order to acquire the site for housing development. <p>As such, the site should not be included within the housing land supply because it does not meet the definition of 'developable' set out within the NPPF. 220 dwellings should, therefore, be removed from the overall supply.</p>	
ARPLEY ROAD						
J1-J5 (UCS) 2672 (SHLAA)	Land south of Wilson Pattern Street (inc. former Ms Smiths), Warrington WA1 1HN	Mixed use	782 (UCS) 300 (SHLAA)	No planning permission	<p>Our Client does not dispute that this site could potentially be suitable to accommodate housing development in the future. However, the SHLAA confirms that:</p> <ul style="list-style-type: none"> • The site is in active use – commercial and retail; • The site does not benefit from planning permission for housing; • The site is not available now; • The site is not being promoted by a developer; and • There is no developer interest in the site. <p>A review of the Land Registry details confirms the site is in multiple private ownerships and the Council has not presented any other evidence to demonstrate that there are reasonable prospects that the site will become available over the Plan period or to demonstrate that the Council intends is impose a compulsory purchase order to acquire the site for housing development.</p> <p>Furthermore, the UCS figure of 782 dwellings is based on a density of 245dpa with housing being delivered on 100% of the site. This assumption conflicts with the findings of the SHLAA and the Warrington Masterplan Overall Illustrative Heights Plan which suggests only the eastern riverside plots would be suitable for a very high density of development. If the Council can;</p>	

Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
					<p>however, demonstrate the site is available, the delivery of 782 dwellings on the site is wholly unrealistic and we consider the SHLAA figure of 300 dwellings to be more appropriate.</p> <p>Notwithstanding this, the Council has failed to robustly demonstrate the availability of the site, therefore, it should not be included within the housing land supply because the site does not meet the definition of 'deliverable' or 'developable' set out within the NPPF. As such, 782 dwellings should be removed from the overall supply and 55 dwellings from the five year housing land supply.</p>	
ST ELPHINS QUARTER						
E9-E13 (UCS)	Land at Fennel Street and Church Street, Warrington	Retail, residential and a car wash	94	No planning permission	<p>The UCS claims that these five parcels will start to deliver dwellings in 2026/27. Whilst the site could potentially be suitable for housing in the future, the site is not currently available because it is occupied by a Lidl supermarket, a nursing home, a car wash as well as several other smaller retail units and private residential properties.</p> <p>A Land Registry search confirms the site is owned by multiple private landowners who are not promoting the site for development through the Local Plan process. Furthermore, the site does not benefit from planning permission for housing and the Council has not presented any evidence in the SHLAA to demonstrate that:</p> <ul style="list-style-type: none"> • There are reasonable prospects that it will become available over the Plan period; • That there is developer interest in the site; and • That the Council intends to impose a compulsory purchase order to acquire the site for housing development. <p>As such, the site should not be included within the housing land supply because it does not meet the definition of 'developable' set out within the NPPF. 94 dwellings should, therefore, be removed from the overall supply.</p>	
SOUTHERN GATEWAY						
I4 and I5 (UCS) 2482 (SHLAA)	Wharf Industrial Estate, Wharf Street, Warrington	Commercial – industrial	129	No planning permission	<p>The site is located on the banks of the River Mersey and falls within Flood Zone 2 and 3. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been passed. The site is, therefore,</p>	

Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
					<p>not suitable to accommodate residential development.</p> <p>Furthermore, the site is not currently available because it is occupied by several well-established commercial businesses. A Land Registry search also confirms that the site is owned by multiple private landowners who are not promoting the site for development through the Local Plan process. The SHLAA acknowledges that there are ownership/tenant issues with this site and the Council has not presented any evidence to demonstrate that these issues can be overcome for there to be reasonable prospects the land will become available over the Plan period.</p> <p>Set in this context, the site is not suitable or developable in accordance with the NPPF and NPPG. As such, 129 dwellings should be removed from the overall supply.</p>	
<p>I8, I12, I13, I14, I15 (UCS) 2676 (SHLAA)</p>	<p>Causeway Park, Wilderspool Causeway, Warrington</p>	<p>Commercial</p>	<p>286 (UCS)</p>	<p>No planning permission</p>	<p>Causeway Park comprises a well-established industrial estate that is not currently available for development. A Land Registry search confirms that the site is owned by multiple private landowners who are not promoting the site for development through the Local Plan process, the site does not benefit from planning permission for housing and the Council has not presented any evidence in the SHLAA to demonstrate that:</p> <ul style="list-style-type: none"> • There are reasonable prospects that it will become available over the Plan period; • That there is developer interest in the site; and • That the Council intends to impose a compulsory purchase order to acquire the site for housing development. <p>The site falls within Flood Zone 2. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been passed.</p> <p>Furthermore, our Client has serious concerns regarding the viability of this site given its current commercial use and potential for contamination. The SHLAA also acknowledges that the site is constrained and is not suitable to accommodate residential development. Set in this context, the site is not suitable, deliverable or developable in accordance with the NPPF and NPPG. As such, 286 dwellings should be removed from</p>	






Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
					the overall supply and 40 dwellings from the five year housing land supply.	
I17, I18 and I19 (UCS) 2450 (SHLAA)	Land adjacent Colas, Loushers Lane	Commercial and trees	113 (UCS)	No planning permission	<p>The site is predominantly in commercial use and is not available for development. The eastern part of the site is also covered in tree and the ecological and recreational value of this part of the site is currently unknown. The SHLAA states that the site is considered unsuitable for residential development but there is strong interest in developing this site and it may be as further exploratory work is undertaken this conclusion may be revisited.</p> <p>If this site is to form part of the overall housing land supply, the Council need to provide robust evidence to demonstrate that there are reasonable prospects that the site will become available and developable over the Plan period as required by the NPPF. At this time, the Council's evidence suggests this site is constrained and not suitable for residential development, therefore, the site cannot be considered suitable or developable for housing.</p> <p>Furthermore, the site falls within Flood Zone 2. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been passed.</p> <p>Set in this context, the Council has not produced any evidence to demonstrate that the site is suitable or developable in accordance with the NPPF and NPPG. As such, 113 dwellings should be removed from the overall supply.</p>	
TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE OVERALL HOUSING LAND SUPPLY:						2,061
TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE FIVE YEAR HOUSING LAND SUPPLY:						192

TABLE 2: WIDER URBAN AREA SUPPLY (SHLAA) (SITES 0.25HA AND ABOVE)

Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
1178 (SHLAA)	Cardinal Newman High School, Bridgewater Avenue, Latchford	Secondary School	110	Outline planning permission granted for residential development and relocation and expansion of formal recreation facilities in October 2006	<p>The UCS claims that this site will start to deliver dwellings in 2025/26. However, the site is currently in active use, occupied by a secondary school and its associated recreational facilities. The site does not currently benefit from planning permission for housing and the Council has not presented any evidence in the SHLAA to demonstrate that:</p> <ul style="list-style-type: none"> • There is no longer a need for the school or recreational facilities on the site; • There is an alternative site to relocate the school; • There are reasonable prospects that it will become available over the Plan period; • That there is developer interest in delivering residential development the site; and • The Council (the landowner) intends to dispose of the site. <p>Furthermore, the site falls within Flood Zone 3. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been passed.</p> <p>As such, the site should not be included within the housing land supply because it is not suitable for residential development and does not meet the definition of 'developable' set out within the NPPF. 110 dwellings should, therefore, be removed from the overall supply.</p>	
2182 (SHLAA)	PDC Irwell Road, Latchford, WA4 6BB	Vacant council offices and disused playing field	50	No planning permission	<p>This site is owned by Warrington Borough Council; therefore, our Client does not dispute that there are reasonable prospects this site could be available for development over the Plan period. However, the emerging Submission Version Proposals Map seeks to protect the playing fields on the eastern part of the site as open space under draft Policy DC5 of the emerging Local Plan.</p> <p>As such, the site should not be included within the housing land supply because it does not meet the definition of 'developable' set out within the NPPF. 50 dwellings should, therefore, be removed from the overall supply.</p>	

TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE HOUSING LAND SUPPLY:						160
TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE FIVE YEAR HOUSING LAND SUPPLY:						0

TABLE 3: WATERFRONT SUPPLY

Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
K9 and K10 (UCS) 1715 (SHLAA)	Spectra Building & Drivetime Golf Range, South of Centre Park Business Park, Warrington, WA1 1QL	Commercial	530	EIA Screening for up to 510 dwellings (ref. 2017/30982)	<p>The two parcels are available, and the site is being promoted by Countryside Properties for the development of up to 510 dwellings. However, our Client has concerns regarding the suitability of the site for residential development.</p> <p>Parcel K9 to the north is in Flood Zone 3 owing to its location on the banks of the River Mersey. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been satisfied. As such, the site does not meet the definition of 'deliverable' or 'developable' and 330 dwellings should be removed from the five year supply and 368 from the overall supply.</p> <p>In relation to the southern part of the site (ref. K10), the Council expects this site to start delivering dwellings in 2020/21. However, the site does not benefit from planning permission and no planning application has been submitted since the EIA Screening Opinion was issued in 2017. Based on the lead-in time assumptions set out in Table 2.2 of the SHLAA this part of the site will not deliver dwellings until 2022/23. An additional 110 dwellings should, therefore, be removed from the five year housing land supply.</p>	
K19	Land to the north of Liverpool Road, Sankey Bridge	Commercial	27	No planning permission	<p>The UCS claims that this site will deliver 27 dwellings within the first five years of the Plan period. The site is occupied, does not benefit from planning permission for housing and has not been identified as being suitable for housing as part of the SHLAA.</p> <p>Moreover, the Council has not presented any evidence to demonstrate that there are reasonable prospects that housing will be delivered on the site within the next five years or that it will become available over the Plan period. There is no developer interest in the site and there is no evidence to suggest that the Council intends to impose a compulsory purchase order to acquire the site for housing development. As such, the site should not be included within the housing land supply because it does not meet the definition of 'deliverable' or 'developable' set out within the NPPF. 27 dwellings should, therefore, be removed from the five year supply as well as the overall supply.</p>	



K20	John Kay Group, Liverpool Road, Sankey Bridges	Commercial	35	No planning permission	<p>The UCS claims that this site will deliver 35 dwellings within the first five years of the Plan period. The site is not available now, does not benefit from planning permission for housing and has not been identified as being suitable for housing as part of the SHLAA.</p> <p>Moreover, the Council has not presented any evidence to demonstrate that there are reasonable prospects that housing will be delivered on the site within the next five years or that it will become available over the Plan period. There is no developer interest in the site and there is no evidence to suggest that the Council intends to impose a compulsory purchase order to acquire the site for housing development. As such, the site should not be included within the housing land supply because it does not meet the definition of 'deliverable' or 'developable' set out within the NPPF. 35 dwellings should, therefore, be removed from the five year supply as well as the overall supply.</p>	
TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE HOUSING LAND SUPPLY:						430
TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE FIVE YEAR HOUSING LAND SUPPLY:						502

TABLE 4: GARDEN SUBURB (PHASE 1) SUPPLY

Site Ref.	Site Address	Existing Use	No. of dwellings assumed by WBC	Planning Status	Barton Willmore Assessment and Commentary	Site Image
308 (SHLAA)	Land at Appleton Cross, Dipping Brook Avenue, Grappenhall	New Town Reserved Land	350	Outline planning permission granted in January 2018 (ref. 2017/29930) Pending Reserved Matters submitted May 2019 (ref. 2019/35105)	<p>Our Client does not dispute that this site is suitable, available and deliverable over the Plan period. However, the SHLAA trajectory expects this site to deliver 294 dwellings within the first five years of the plan period as set out below.</p> <p><u>Years 1 - 5</u></p> <ul style="list-style-type: none"> • 2018/19 – 0 dwellings • 2019/20 – 42 dwellings • 2020/21 – 84 dwellings • 2021/22 – 84 dwellings • 2022/23 – 84 dwellings <p>Total: 294</p> <p><u>Years 6 +</u></p> <ul style="list-style-type: none"> • 2023/24 – 56 dwellings <p>Total: 56</p> <p>Our Client is concerned that the delivery rates proposed for this site are unrealistic given a Reserved Matters application was only submitted by the Barratt and David Wilson Homes in May 2019. Based on the lead-in times set out in Table 2.2 of the SHLAA and given Reserved Matters has been submitted to the Council we would expect this site to start deliver dwellings until 2021/22 at best.</p> <p>As such, the trajectory should be amended as follows and 168 dwellings should be removed from the five year housing land supply:</p> <p><u>Years 1 - 5</u></p> <ul style="list-style-type: none"> • 2018/19 – 0 dwellings • 2019/20 – 0 dwellings • 2020/21 – 0 dwellings • 2021/22 – 42 dwellings • 2022/23 – 84 dwellings <p>Total: 126</p> <p><u>Years 6 +</u></p> <ul style="list-style-type: none"> • 2023/24 – 84 dwellings • 2024/25 – 84 dwellings • 2025/26 – 84 dwellings • 2026/27 – 56 dwellings <p>Total: 308</p>	

<p>1646 (SHLAA)</p>	<p>Grappenhall Heys, Curzon Drive, Grappenhall Heys</p>	<p>New Town Reserved Land</p>	<p>400</p>	<p>Outline planning permission granted in January 2018</p>	<p>Our Client does not dispute that this site is suitable, available and deliverable over the Plan period. However, the SHLAA trajectory expects this site to deliver 360 dwellings within the first five years of the plan period as set out below.</p> <p><u>Years 1 - 5</u></p> <ul style="list-style-type: none"> • 2018/19 – 0 dwellings • 2019/20 – 72 dwellings • 2020/21 – 96 dwellings • 2021/22 – 96 dwellings • 2022/23 – 96 dwellings <p>Total: 360</p> <p><u>Years 6 +</u></p> <ul style="list-style-type: none"> • 2023/24 – 40 dwellings <p>Total: 40</p> <p>Our Client is concerned that the delivery rates proposed for this site are not achievable in the short term. Homes England and Rowland Homes submitted two concurrent Reserved Matters applications for 66 dwellings (Phase 1) (ref. 2019/34480) and 114 dwellings (Phase 1b) (ref. 2019/34481) in February 2019. Both applications were subsequently refused consent in May 2019 for reasons relating to:</p> <ul style="list-style-type: none"> • Highway safety; • Design; • Residential amenity impact; • Affordable housing; and • Ecological and landscape mitigation. <p>Our Client believes the reasons for refusal can be overcome over the Plan period. However, the refusal of the two applications will have a significant impact on the delivery rates for Phases 1 and 1b.</p> <p>As such, based on the lead-in times set out in Table 2.2 of the SHLAA for sites benefitting from outline planning permission we would expect this site to start delivering dwellings in 2022/23 at best. The trajectory should, therefore, be amended as follows and 288 dwellings should be removed from the five year housing land supply:</p> <p><u>Years 1 - 5</u></p> <ul style="list-style-type: none"> • 2018/19 – 0 dwellings • 2019/20 – 0 dwellings • 2020/21 – 0 dwellings • 2021/22 – 0 dwellings • 2022/23 – 72 dwellings <p>Total: 72</p> <p><u>Years 6 +</u></p> <ul style="list-style-type: none"> • 2023/24 – 96 dwellings
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					<ul style="list-style-type: none">• 2024/25 – 96 dwellings• 2025/26 – 96 dwellings• 2026/27 – 40 dwellings Total: 328	
TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE HOUSING LAND SUPPLY:						0
TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE FIVE YEAR HOUSING LAND SUPPLY:						456

**APPENDIX 4:
SMITHY BROW, CROFT REPRESENTATIONS – JUNE 2019**



Land off Smithy Brow, Croft

Warrington Local Plan Review
Proposed Submission Version: Regulation 19 Consultation
Iceni Projects on behalf of Wallace Land Investments

June 2019

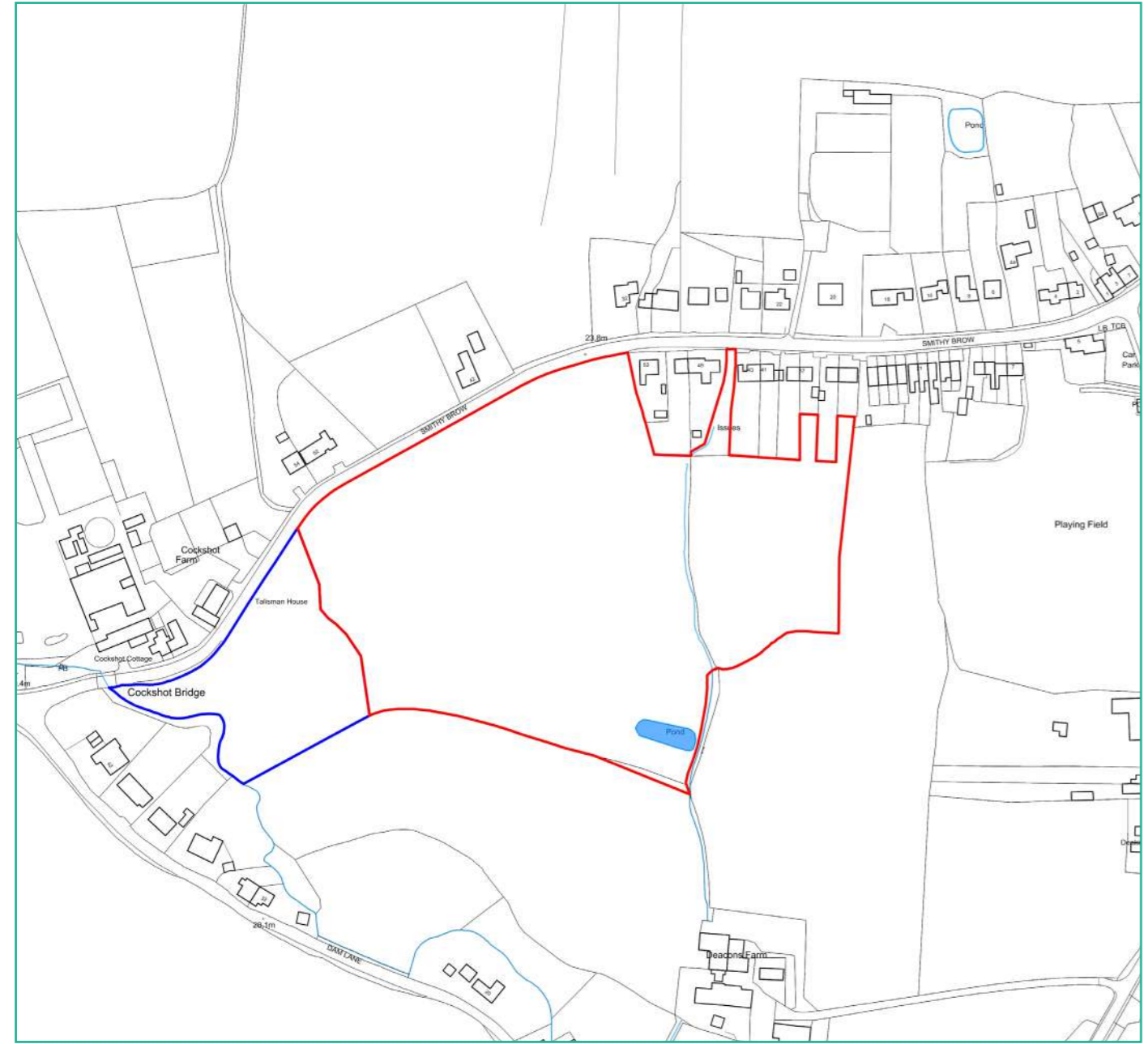


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- 6. Introduction
- 10. Development Vision
- 14. Comparing Land Off Smithy Brow Against Proposed Allocations
- 20. Conclusion



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Site boundary - 4.08ha / 10.08ac
Additional area within title ownership - 0.73ha / 1.8ac

Figure 1. Site Location Plan



Site boundary
Additional area within title ownership

Figure 2. Aerial Site Location Plan

Introduction

1.0 Wallace controls 4.1 ha (10.1 acres) of land off Smithy Brow, Croft. This has the potential to provide a sustainable development that can accommodate up to approximately 90 new homes (30% of which to be affordable), informal and formal public open space, serviced site for convenience store and locally equipped area of play.

1.1 Wallace considers that further development in the outlying settlements can help deliver early housing completions in the early period of the Local Plan to help ensure that the Council meets its housing and requirement and maintains a 5 year effective housing land supply.

1.2 Wallace prepared representations which were submitted at the Preferred Development Options (PDO) (September 2017) stage. The representations included a vision document for Land at Smithy Brow presents an opportunity to accommodate residential development on a sustainable and deliverable site.

1.3 As an essential characteristic of the Green Belt is the long term permanence of its boundaries. It is important that the process of establishing long term Green Belt boundaries has regard to the potential development needs of Croft arising in the longer term. Identifying sufficient, suitable and sustainable land to be released from the Green Belt now will ensure that the boundaries will not need to be changed post 2037.

2. NEED FOR GROWTH IN THE OUTLYING SETTLEMENTS

2.1 The Local Plan Draft defines an approximate number of homes the Council considers could be accommodated in each of the outlying settlements. This set out in Policy DEV1 – Housing Delivery which indicates in DEV1 (4) 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:

- a. Burtonwood - minimum of 160 homes**
- b. Croft - minimum of 75 homes**
- c. Culcheth - minimum of 200 homes**
- d. Hollins Green- minimum of 90 homes**
- e. Lymm - minimum of 430 homes**
- f. Winwick - minimum of 130 homes**

2.2 The Council's development strategy for the outlying villages only allocates one site for 75 homes at Croft, out of 1,085 homes to be allocated. This is 7% of the overall housing land requirement.

2.3 Wallace has highlighted in its General Representations to the Draft Local Plan, that there are delivery issues due to lead-in times; infrastructure and remediation costs with a number of the brownfield sites in the Draft Local Plan's initial plan period (Years 0-5). This will inevitably lead to a delay in the delivery of effective housing land readily available for development at the adoption of the Local Plan. The reduction in the effective brownfield land supply means that more greenfield land within the outlying settlements is necessary to achieve the Council's growth aspirations. Accordingly, greenfield sites which can utilise existing infrastructure capacity and are immediately effective will deliver homes within the early years of the plan period.

2.4 Notwithstanding the concern about the sites currently allocated in the Draft Plan, Wallace maintains that additional sustainable, and effective housing land is required over and above that already identified in the Draft Local Plan. It should be noted that the 20% flexibility requires a further 1,890 homes to be allocated on sites in the Green Belt, given the capacity of the sites in the Urban Capacity is relatively fixed at 13,726 homes. In terms of the future release of sites in the Green Belt, it is proposed that up to 40% should be allocated to the outlying settlements (750 homes) with the balance (1,140 homes) being delivered from further sites in the South Warrington Garden Suburb. Neither the Waterfront or the South West Urban Extension are considered to offer any real prospects of increasing completion rates from its land supply in the initial period of the Local Plan.

2.5 As Croft is currently only required to provide 7% of the Council's housing land requirement for its development strategy in the outlying villages, its housing target should be increased by 52 homes (7% of the proposed increase of 750 homes) to 127 homes in total. This means allocating a minimum of **127 homes for Croft** is a consequence of **increasing the flexibility allowance from 10% to 20%**. It is recommended that, subject to specific site assessments, the settlement growth for Croft is increased proportionately to a minimum of 127 homes.

3. CROFT'S POTENTIAL TO ACCOMMODATE FURTHER DEVELOPMENT

3.1 According to the Settlement Profile Document (2017), Croft has a population of approximately 1,367 persons based on 606 households. The minimum number of new homes for Croft has been increased from 60 new homes identified in the in the PDO to a revised figure of **minimum 75** new homes for Croft. This is welcome but only represents 12% increase on the current settlement size.

3.2 Croft is an attractive village location, but there is a lack of choice of range and type of housing in Croft.

3.3 The village has a historic core stretching along Smithy Brow and Lord Street on an east west access. This was expanded in the 1960s, 1970s and 1980s with poorly integrated "suburban form of development," predominantly located to the south east of Lord Street and bounded by New Lane.

3.4 In order to support the sustainability, vitality and future prosperity of the village and to provide much needed housing choice as well as meeting local housing needs, Wallace recommends that the Council, subject to specific site assessment, should accommodate a **minimum of 127 homes in Croft**.

4. SUSTAINABILITY OF THE SITE'S LOCATION IN CROFT

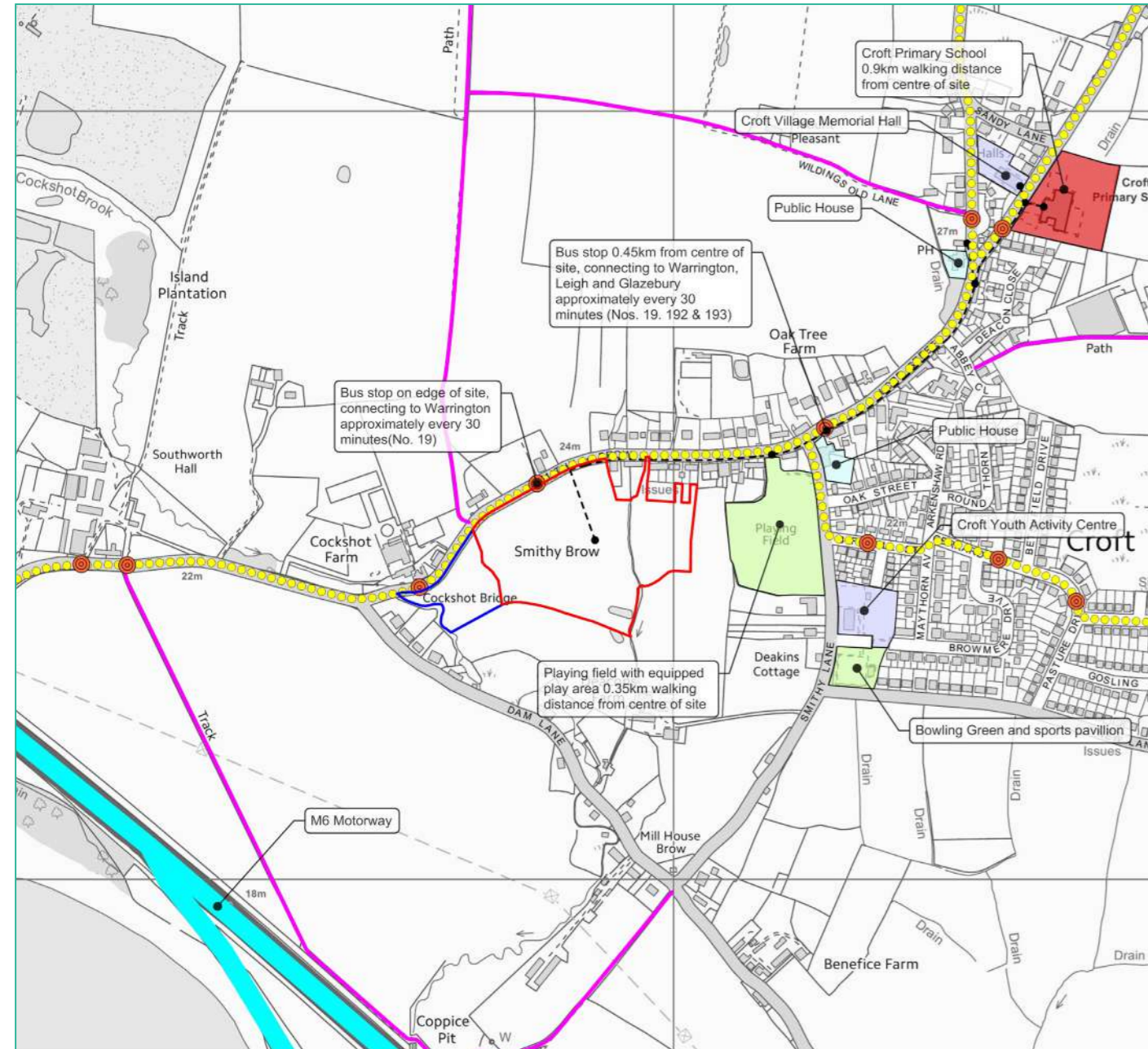
4.1 The strategic location of the Borough between the two city regions of Cheshire and Lancashire means that the outlying villages of Warrington offer a highly desirable and attractive location to live. This applies to Croft where average house prices are among the highest across the outlying settlements.

4.2 Croft's locational advantage is its proximity to the M6 Junction 21A and M62 interchange which provide regional and national connections. Croft is also within close proximity to the Warrington urban area and the major employment hubs at Birchwood and Risley, with nearby connections to the A59 and A579, enabling ease of access to nearby Winwick and Culcheth.

4.3 According to the Settlement Profile Document (July 2017), the age profile for the Culcheth, Glazebury and Croft ward is 16.3% aged under 16, 61.9% aged 16-64, and 21.8% aged 65+ (2015). This is a relatively young demographic profile.

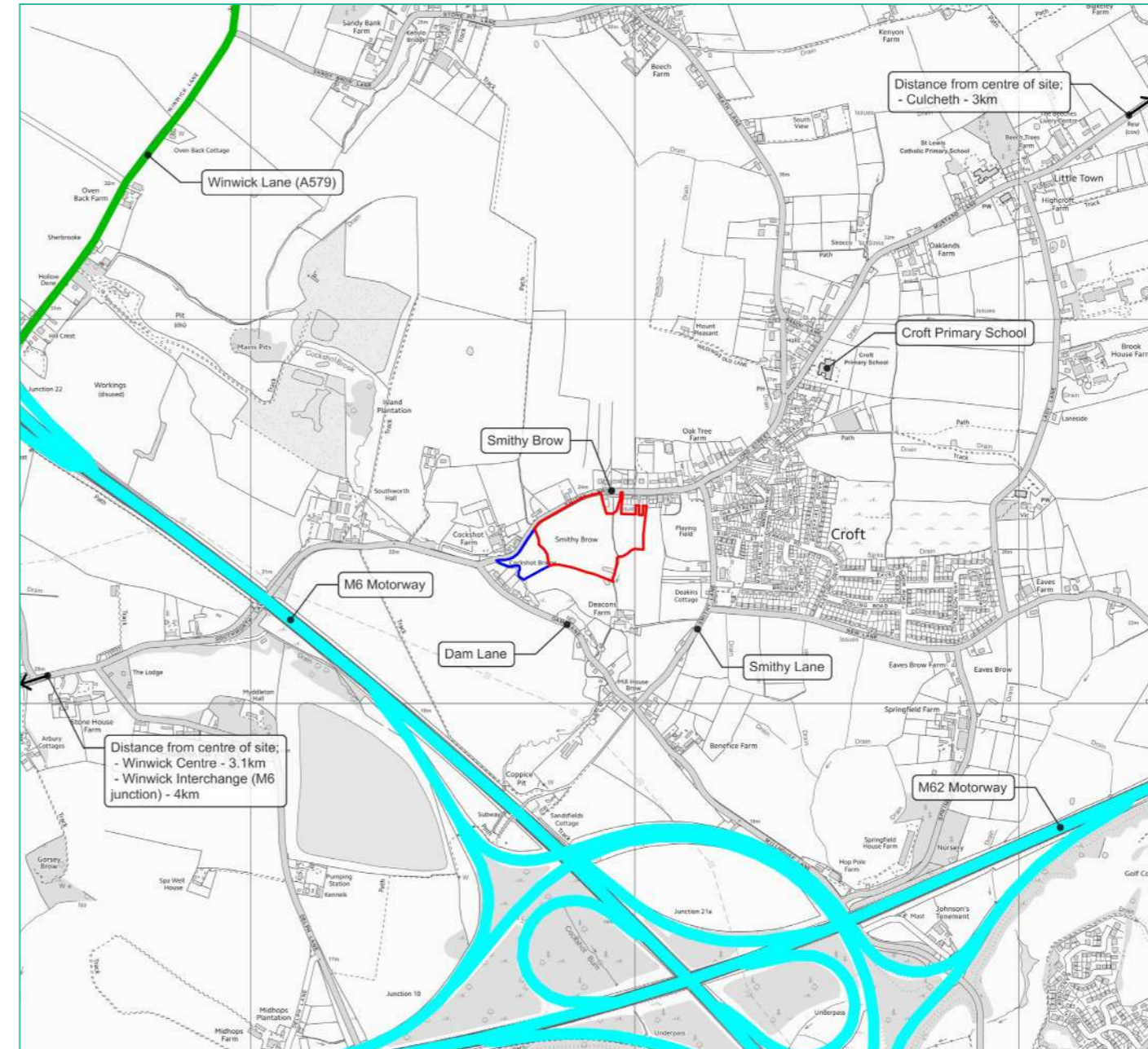
4.4 The site is situated at the hub of the village's current amenities. To the east is the Horseshoe Inn public house, the youth activity centre, bowls club, and playing fields and within 800m north (along Smithy Brow) is Croft Primary School. Bus services are available immediately adjacent to the site on Smithy Brow.

4.5 Croft Primary and St. Lewis Catholic Primary Schools are located less than a mile away. Birchwood Community High School is located approximately 3.5 miles south of the site and Culcheth High School 3 miles north east. Birchwood Technology Park is less than 3 miles away and supports over 165 businesses and over 6,000 employees.



- Site boundary
- Additional area within title ownership
- Land use: School
- Land use: Leisure (hotel, pub etc.)
- Land use: Outdoor sports facilities
- Land Use: Community
- Bus route
- Bus stop
- Walking distance from centre of site
- Motorway

Figure 3. Sustainable Location Plan



- Site boundary
- Additional area within title ownership
- Motorway
- 'A' Road

Figure 4. Strategic Location Plan

Development Vision for Land Off Smithy Brow

5. GREEN BELT ALLOCATION

5.1 The site was submitted via the Call for Sites in 2016 (References **R18/098** and **R18/052**). It was assessed in the 2017 SHLAA as part of the ongoing process to identify the Council's 'deliverable' and 'developable' supply of housing land.

5.2 Land off Smithy Brow, Croft was assessed within the 2017 and 2018 SHLAA as being 'constrained' due to its designation as Green Belt. It is apparent that the site's SHLAA assessment takes the format of the standardised response used by the Council when assessing Green Belt sites, noting that "*Sites within the Green Belt, unless in compliance with the provisions of appropriate development as defined by the NPPF, are considered unsuitable due to policy constraints. In such circumstances, it is premature for the SHLAA to endorse specific sites in the Green Belt as suitable for residential development in advance of any comprehensive review of Warrington's Green Belt to evaluate whether there are appropriate locations for future development.*"

5.3 The Green Belt Assessment (October 2016) assessed individual parcels within the defined character areas. Land off Smithy Brow is identified as Reference **CR8** and is assessed as providing an overall **Moderate** contribution to the function of the Green Belt.

5.4 CR8 is assessed as the following:

- No contribution: to check the unrestricted sprawl of large built-up areas
- Weak contribution: to prevent neighbouring towns merging into one another
- Strong contribution: to assist in safeguarding the countryside from encroachment
- No contribution: to preserve the setting and special character of historic towns
- Moderate contribution: to assist urban regeneration by encouraging the recycling of derelict and other urban land.

5.5 The Green Belt Report Addendum (July 2017) assessed all sites that had been submitted as part of the 2016 Call for Sites consultation. Land at Smithy Brow was again, assessed as performing a **moderate contribution** to Green Belt purposes.

6. RSK LANDSCAPE ASSESSMENT ABOUT THE SITE'S CONTRIBUTION TO THE GREEN BELT

6.1 RSK was commissioned by Wallace to review the Council's analysis and categorisation of the site - Land at Smithy Brow. The RSK assessment was submitted to the Council at the PDO stage.

6.2 The RSK assessment identified shortcomings in the Council's analysis of the site's contribution to the Green Belt as it did not fully appreciate or consider the durability of the boundaries between the site and wider countryside to the south. Both of these features can contain encroachment. In addition, although there are open views within the immediate vicinity of the site, long views are restricted by further vegetation and urban form between the site and open countryside.

6.3 RSK determined that Land at Smithy Brow provided a **moderate contribution to Purpose 3** rather than the **strong contribution** concluded in the Green Belt Assessment. In light of this, RSK concluded that the overall classification should be amended so that Land at Smithy Brow is categorised as providing an overall **weak contribution** to Green Belt purposes.

6.4 Compared to the proposed allocated site at Deacon's Close, this site makes a lower contribution to the Green Belt and is therefore a better site to consider for future development.

7. AGRICULTURAL LAND CLASSIFICATION

7.1 The site comprises mainly of Grade 3, which is good to moderate quality agricultural land, as described in MAFF (1988) *Agricultural Land Classification of England & Wales*. The Council's proposed allocation at Deacon's Close, Croft is also Grade 3.

8. TOPOGRAPHY

8.1 The site is relatively flat but slightly undulates from east to west and rises up slightly towards Smithy Brow in the west. The topography of the site does not pose any constraints to the site's development.

9. DRAINAGE / FLOODING

9.1 Environment Agency flood mapping confirms it is in Flood Zone 1 and therefore is at low risk of flooding. An appropriate flood risk assessment will be undertaken as part of a planning application. The proposal will incorporate SUDS measures to ensure that surface water from the proposal meets greenfield run-off requirements.

10. PROPOSAL

10.1 The site presents an opportunity to accommodate residential development within easy reach of existing amenities in Croft. It can accommodate up to approximately 90 new homes (up to 30% of which to be affordable) together with informal and formal public open space and a locally equipped area of play along with a serviced site for a convenience store.

10.2 Homes will include 2, 3, 4 and 5-bedroom market houses and affordable housing. All homes will be accessible within a safe environment. The proposal is designed to integrate with the existing urban structure of Croft and provide a logical extension with ease of access to Croft's existing amenities such as the playing fields, Pub, youth centre and bowling green. The proposal also provides the opportunity to locate a new village convenience store.

10.3 Vehicular, pedestrian and cycle access will be provided off Smithy Brow with an easily accessible network of paths and public rights of way.

10.4 The movement hierarchy in and around the site will provide safe and convenient access for pedestrians and cyclists. This is achieved through a combination of shared surface lanes and a remote path network.

10.5 Structure planting will be provided along the southern, eastern and western boundaries of the site. These existing field boundaries around the site will be strengthened to form a new inner Green Belt boundary. The structure planting will provide visual screening and an attractive edge to the development. The structure planting will also incorporate rural paths around the site. These boundaries will promote biodiversity and form a key element in establishing of new wildlife habitats and corridors in the area.

11. JUSTIFICATION OF THE ALLOCATION OF LAND AT SMITHY BROW, CROFT FOR 90 HOMES

11.1 The Council's development strategy allocates 75 homes out of 1,085 homes to Croft. This represents 12% increase on the village's current scale of housing. For the reasons submitted in Wallace's representation about the housing land requirements, Wallace recommends that the flexibility allowance should be increased from 10% to 20%, adding a further 1,890 homes to the housing land requirement. Wallace considers that 750 homes should be added to the overall requirement to be met in the outlying villages. This provides an opportunity to add smaller sites which are immediately effective and can deliver completions in the early years of the Local Plan. Applying a proportionate increase of this additional housing, this increases the scale of housing to be allocated in Croft to 127 homes.

11.2 As such, Wallace proposes the allocation of Land off Smithy Brow, Croft which could support the sustainable growth of the village and at the same time, support the growth aspirations for Warrington. The site will provide a minimum of **90** dwellings, together with a potential convenience store, play area and public open space. Whether this site should be in addition to Deacon's Close or be a substitute for the proposed allocation, would be subject to assessments of its comparative Green Belt contribution and its sustainability.

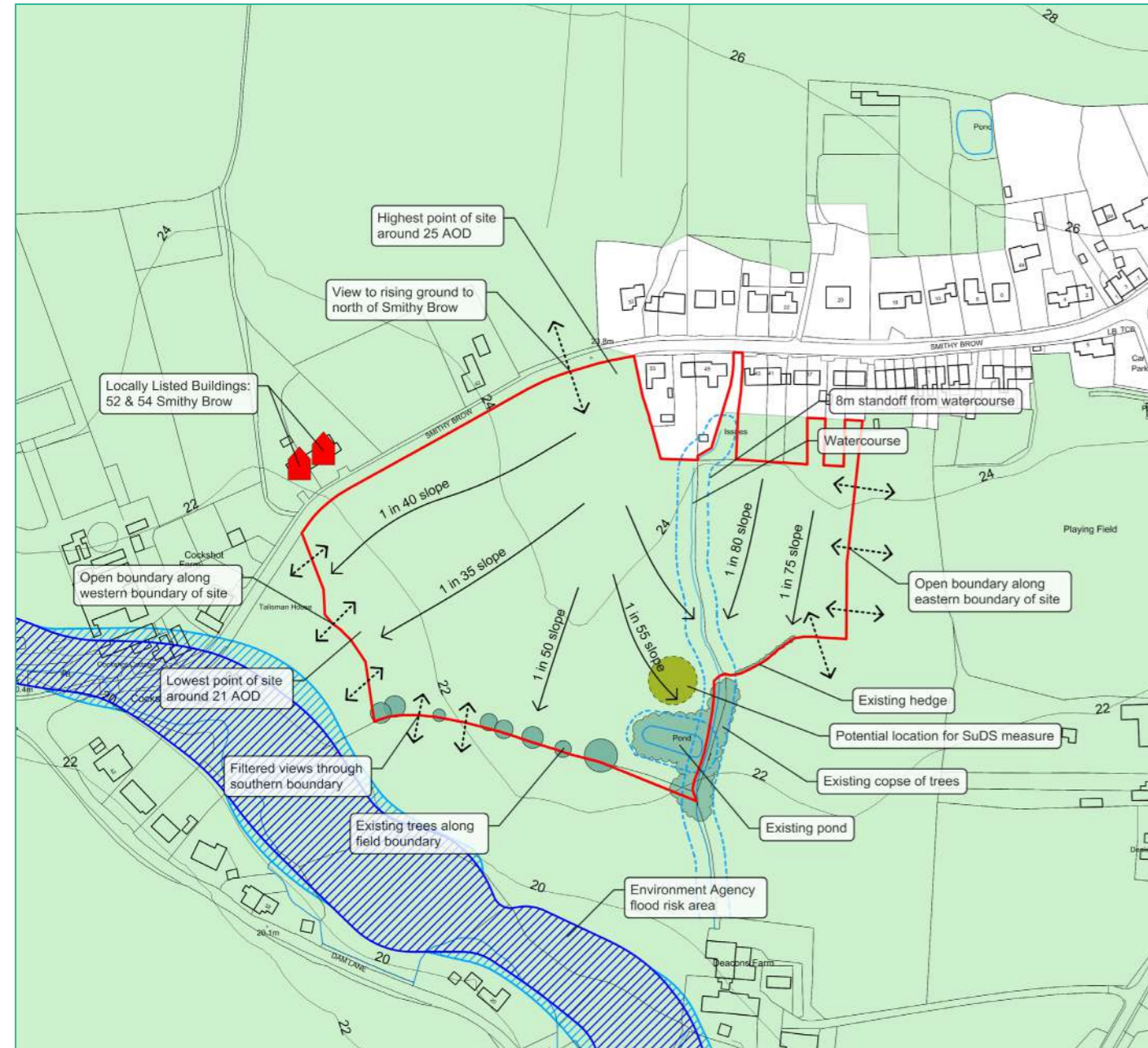
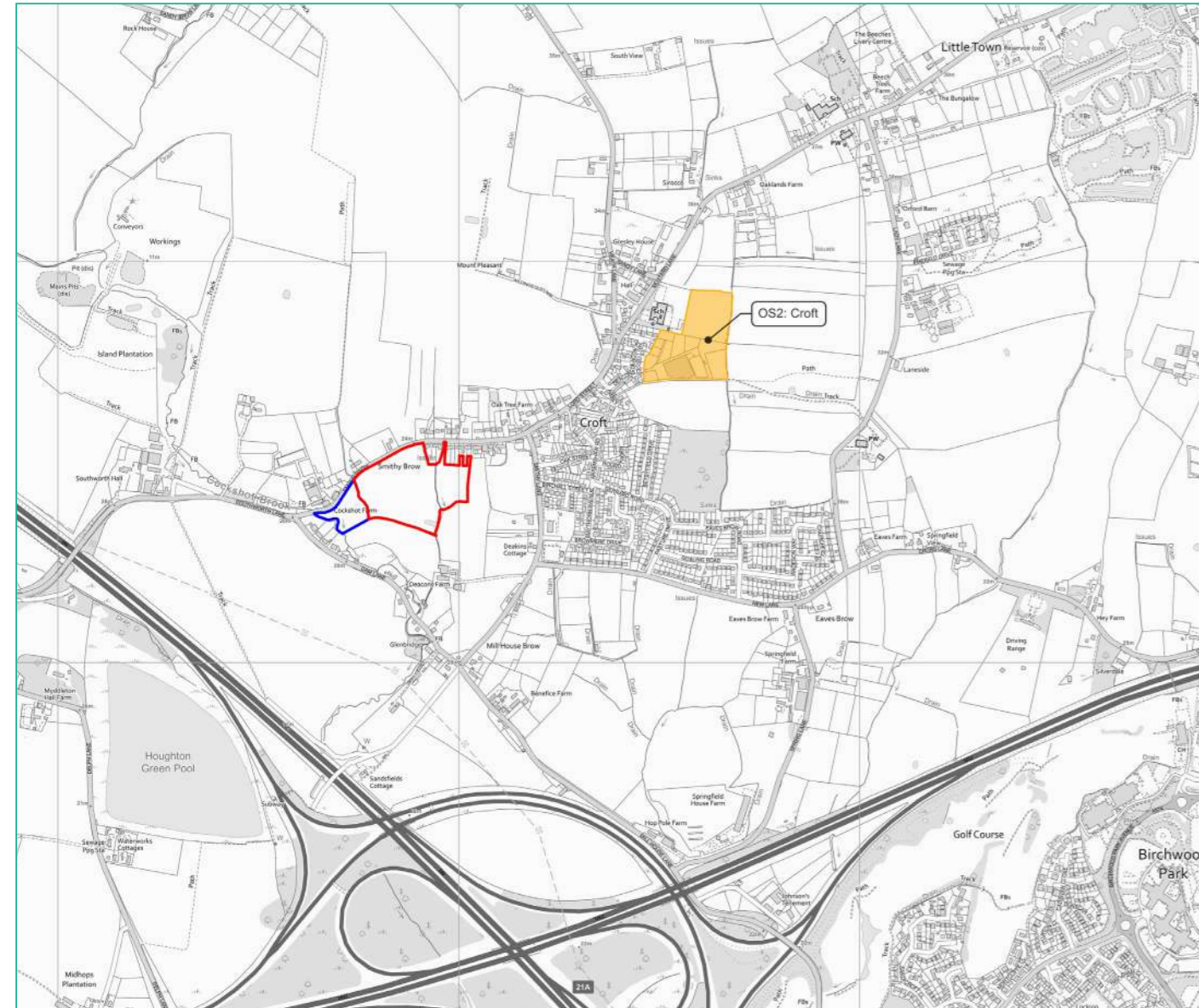


Figure 5. Opportunities & Constraints Plan



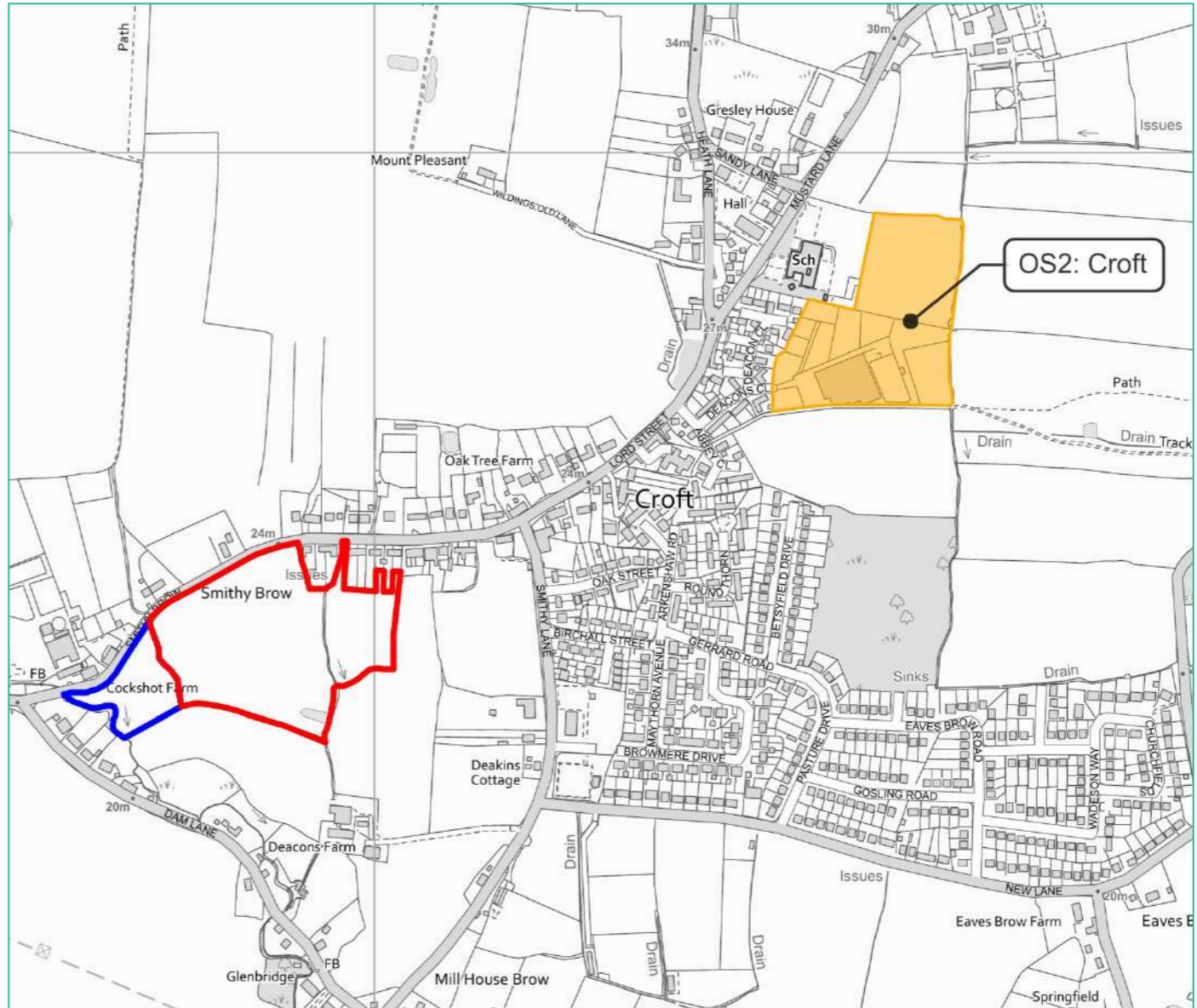
Figure 6. Indicative Development Framework

Comparing Land Off Smithy Brow Against Proposed Allocations



- Site boundary
- Additional area within title ownership
- Site Allocation as identified in Warrington Proposed Submission Version Local Plan 2019

Figure 7. Proposed Allocations Plan | Croft



- Site boundary
- Additional area within title ownership
- Site Allocation as identified in Warrington Proposed Submission Version Local Plan 2019

Figure 8. Proposed Allocations Plan | Croft

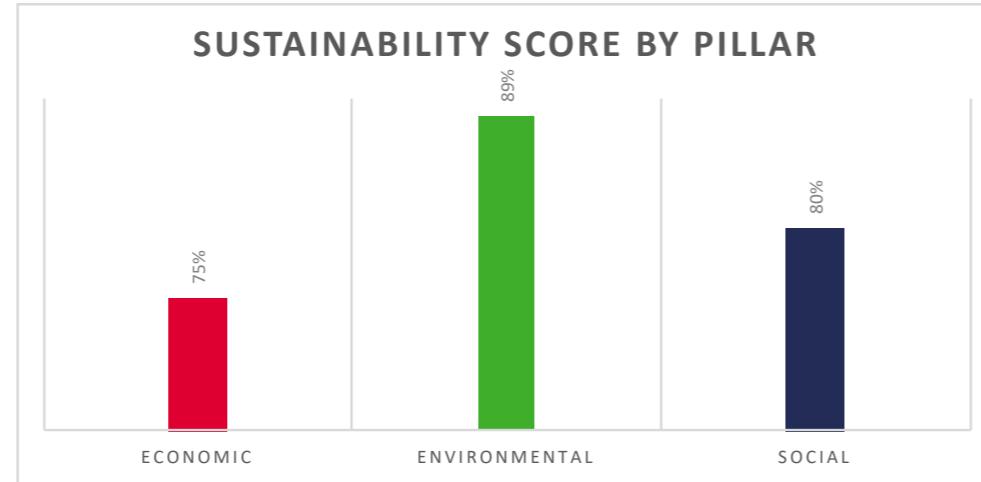
Comparing Land Off Smithy Brow Against Proposed Allocations

12. SUSTAINABILITY SCORECARD ASSESSMENT

12.1 As part of the background work used to inform Wallace’s choice at Land at Smithy Brow, Croft, the ‘Sustainable Development Scorecard’ has been utilised. This is a tool developed by the Sustainable Development Commission, chaired by former Planning Minister Nick Raynsford. The Scorecard provides a basis to assess the extent to which development proposals have the... ‘golden thread of sustainable development’ running through them, providing a quantitative assessment of sustainable development credentials, as defined by the National Planning Policy Framework (NPPF).

12.2 The Scorecard results are broken down into two scores; an overall ‘Sustainability Score’ which assesses the total contribution from each of the three pillars and is the most important measurement for the sustainability of the site. The ‘Parity Score’ determines how balanced the contribution is from each of the three pillars.

12.3 When assessed, **Land at Smithy Brow, Croft has a total integrated sustainability score of 81%** and when broken down, its economic score is 75%, its environmental is 89% and its social score is 80%.



13. COUNCIL’S SUSTAINABILITY APPRAISAL OF LAND AT SMITHY BROW, CROFT

13.1 As part of Wallace’s Local Plan response, a review of the Council’s Sustainability Appraisal for Land at Smithy Brow, Croft has been carried out.

13.2 The review has been conducted based on the site appraisal findings stated in Tables 6.2 to 6.4 in the Sustainability Appraisal (SA). The following methodology is utilised in the SA and a higher score represents a more sustainable development. Sites considered for housing are able to achieve a maximum score of 104.

- Mitigation likely to be required/unavoidable impacts – 1
- Mitigation may be required/unavoidable impacts – 2
- Unlikely to have a major impact on trends – 3
- Promotes sustainable growth – 4

13.4 The Council’s Sustainability Appraisal score for Land at Smithy Brow was for an employment site and was **53/76**. In conducting a review of the SA, modifications are required to accommodate the current proposal which promotes the site for residential and not employment use. The revised score for Land at Smithy Brow, as a residential development, is increased to **77/104**.

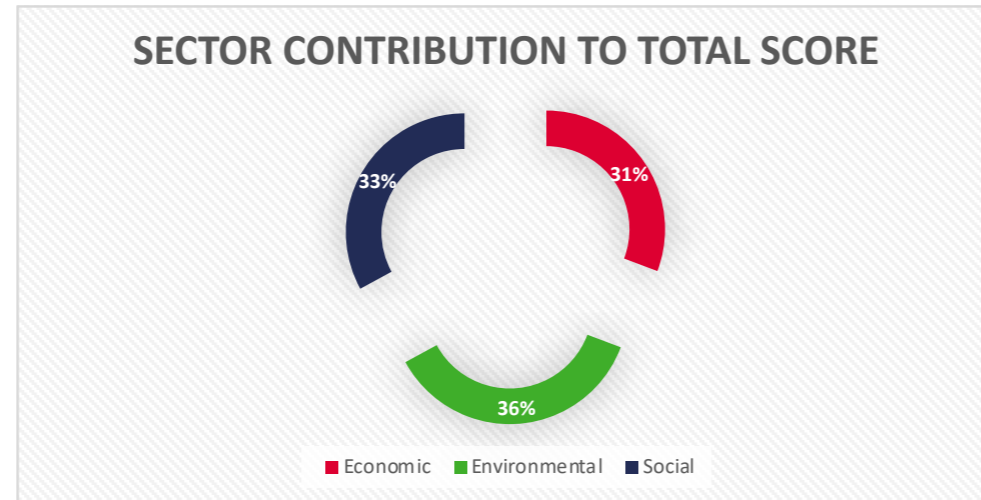


Figure 9. Sustainable Development Scorecard Results. Land at Smithy Brow, Croft

13.5 The proposal by Wallace Land has a more diverse land use including residential use, open space, areas of play and a convenience store. The site has ease of access to existing community facilities and includes both natural green space and formal play space. Primary and secondary schools with a surplus of places are also in the vicinity of the site. A health centre is located less than 2 miles away in Culcheth. This leads to a higher outcome in terms of sustainability.

14. REVIEW OF POLICY OS2 - DEACONS CLOSE (75 HOMES)

14.1 The Draft Local Plan proposes to allocate land to the north east of Croft adjacent to Deacons Close for a minimum of 75 homes at a density of 30 dph. The following highlights issues associated with this proposed allocation:

1. Sustainability of the Proposed Allocation
2. Strength of Resultant Green Belt Boundaries; and
3. Effectiveness of the Allocated Site

14.2 These issues fundamentally impact on the underlying reasons for this site’s allocation in the Draft Local Plan.

Sustainability of Proposed Allocation

14.3 Using the Sustainability Scorecard, the land at Deacons Close, Croft was found to have a **total integrated sustainability score of 72%** and when broken down, its economic score was 67%, environmental 71% and social 78%. The parity score is **88%** which is the same as Land at Smithy Brow. This compares to a higher **total integrated sustainability score of 82%** for Land off Smithy Brow.

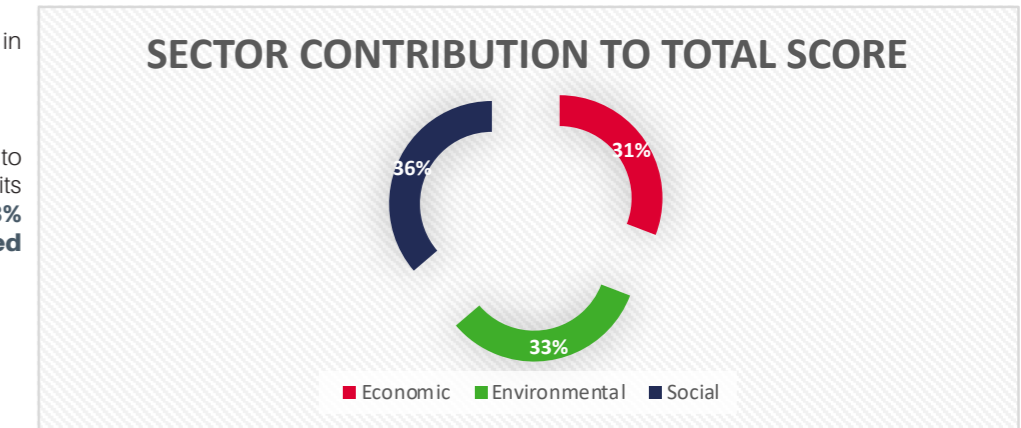
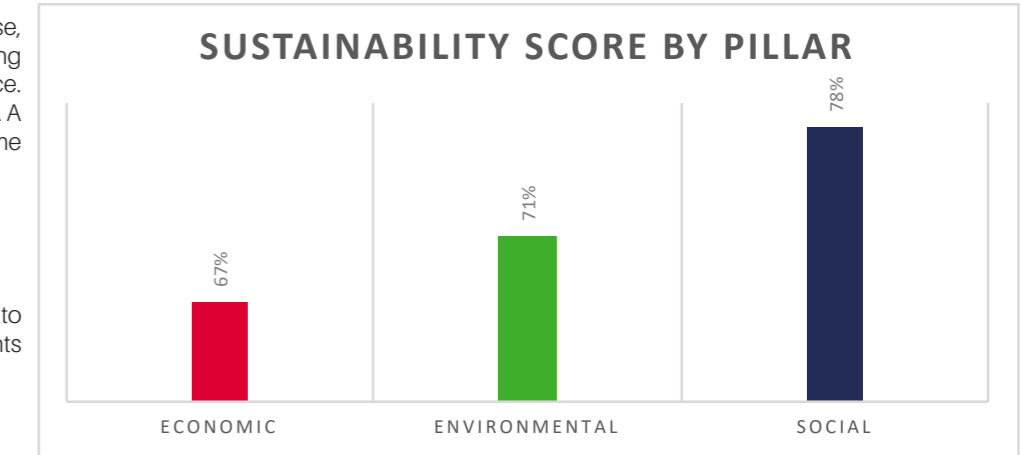


Figure 10. Sustainable Development Scorecard Results. Deacons Close, Croft

Comparing Land Off Smithy Brow Against Proposed Allocations

Strength of the Resultant Green Belt Boundaries

14.4 The Green Belt Assessment (October 2016) assessed the functionality of Warrington's Green Belt in accordance with the five functions of the Green Belt. The Study distinguished Green Belt functionality into four categories:

- No contribution;
- Weak contribution;
- Moderate contribution; and
- Strong contribution.

14.5 In terms of Green Belt, the Draft Allocated Site at Deacons Close is within Parcel CR4. The Assessment finds this parcel makes a **“moderate contribution”** overall with a **Strong Contribution** under **Purpose 3 - to safeguard the countryside from encroachment**.

Reasoning: “The boundaries between the parcel and the settlement to the south and west are non-durable consisting of the rear gardens of residential properties with fences/hedges. These boundaries would not be able to prevent encroachment into the parcel.” The assessment also states that “The parcel is connected to the countryside along two boundaries. The existing land use consists predominantly of undeveloped countryside with a church and residential development in the north eastern corner of the parcel. The parcel also includes Heathcroft Stud stables and Oaklands Farm. The parcel is flat with less than 10% built form however there is an area of dense woodland to the south of the parcel with some tree lining along field boundaries within the parcel. The parcel therefore supports a strong-moderate degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment due to its openness and non-durable boundaries with the settlement”

14.6 Based on the reasoning set out above, the proposed site at Deacon's Close results in the Green Belt boundaries which are weak and allow further unchecked encroachment into the Green Belt especially to the north and west. In terms of the comparison between the proposed allocation at Deacon's Close and Wallace's site land at Smithy Brow, it is evident that Land at Smithy Brow is not just more sustainable, it has a lower contribution to the Green Belt. Both assessments support the allocation of Land at Smithy Brow instead of Deacon's Close.

Effectiveness of the Allocated Site

14.7 The Options and Site Assessment Technical Report (2019) conducted by the Council

states that appropriate access can be provided. However, Wallace recommends that this should be reconsidered as the site's access is considered to be constrained.

14.8 In terms of access, Wallace notes that the proposed access is a somewhat tortuous single point of access via Abbey Close/Lord Street junction. This access arrangement is not suitable for such an intensification of use, especially its visibility to the left from Abbey Close is already sub-standard for the 30mph speed limit on Lord Street. There could also be an issue with cul-de-sac lengths for the far reaches of the site.

14.9 Pedestrians tend to use Deacons Close and the Abbey Close to access the village centre and the Primary School. The carriageway is only about 4m wide as it approaches the access to the Stud. This is not suitable for two-way access for vehicles with a pedestrian footpath at the entrance to the site. Third party land is likely be required to widen the road and create a pedestrian footpath at the entrance to the site. Wallace considers this to be unachievable due to the proximity of house plots at the entrance to the site.

14.10 The need for mitigation is already highlighted in the Draft Policy which states that...***A package of transport improvements will be required to support the development***

14.11 Whilst the Policy states that the site performs well against the objectives of the Local Plan, the NPPF and the Local Plan Sustainability Appraisal, Wallace concludes that site is constrained.

14.12 Access to employment in Warrington Town Centre, the Westbrook and Omega and further afield to Liverpool and Manchester is via the motorway network. This will mean travelling westwards using Smithy Brow through the village from the site at Deacon's Close. Access to the closest employment areas in Birchwood to the south will be from the through the village via Smithy Lane to Locking Stumps. Both pass through the village from the site at Deacon's Close, passing the site proposed by Wallace. Wallace highlights that by allocating the site at Smithy Brow, all traffic travelling to these employment areas will not have to pass through the village, alleviating traffic impact.

14.13 The supporting text for Policy OS2 states that site is relatively unconstrained and that it can be delivered in the early part of the Plan period. Given its investigations, Wallace has concluded that the proposed allocated site is constrained and that major junction improvements will be necessary to allow access to the site. It is inevitable that these road improvements will require third party land. The road upgrading works may not be physically possible at the entrance to the site off Deacon's Close due to the proximity of house plots and therefore the site may be undeliverable.

14.14 Given that the deliverability of the site in doubt, The Council should seek confirmation to prove that access can be achieved to the requirements of the Council. If this cannot be proven then the site should be deemed constrained and no-effective. Wallace's site at Smithy Brow should therefore be substituted and released from the Green Belt.

15. CONCLUSION

15.1 Given the evidence presented above, Wallace concludes that the Integrated Sustainability Score for Deacons Close of **72%** and is substantially lower than the **81%** achieved at Land off Smithy Brow, as demonstrated in the Sustainability Checklist.

15.2 The Council's evidence from its Green Belt Assessment is that the proposed allocation does at Deacon's Close not fully meet the requirements and necessary criteria to be released from Green Belt. In particular, it performs a **Moderate Contribution** to the purposes of Green Belt overall and a **Strong Contribution to Purpose 3** as independently assessed in the Green Belt Assessment (2016). This is compared to the overall **Weak Contribution** of Smithy Brow as assessed by RSK.

15.3 Wallace notes that the proposed access is a constrained and somewhat tortuous single point of access via Abbey Close/Lord Street junction.

15.4 The site at Deacon's Close is in active use, demonstrated by the Options and Site Assessment Technical Report (2019), and its availability for housing is therefore limited. In comparison, Land at Smithy Brow is immediately available and is effective.

Overall Conclusion

- 16.1 Wallace agrees that Green Belt land is required to meet the housing land requirements.
- 16.2 Wallace considers that the Council’s development strategy has too great a reliance on completions from sites in the Urban Capacity in the short term and that completions from the Waterfront and South West Urban Extension will be delayed. Accordingly, the flexibility allowance needs to be increased from 10% to 20%. This requires a further 1,890 homes to allocated on sites in the Green Belt, including the outlying settlements. Given the need is for effective sites which can deliver completions in the short term, Wallace recommends 40% of this housing land requirement (750 homes) is delivered in the outlying villages. In terms of proportionality, this represents a 7% increase for Croft or a total of 127 homes to be allocated in the village.
- 16.3 Wallace agrees that it is crucial that the sites that are allocated in the outlying settlements are suitable, sustainable and deliverable in the Plan Period. It has been shown above that the site currently allocated in the Draft Plan at Deacon’s Close, Croft is seriously constrained because of its inadequate vehicular and pedestrian access.
- 16.4 As part of the sustainability appraisal comparing both sites, the Land at Smithy Brow, Croft is more sustainable site than the proposed allocation at Deacon’s Close:

- 16.7 land at Smithy Brow can be delivered immediately without any major infrastructure improvements. The evidence provided by Wallace in its General Representations and above, demonstrates that there is a potential under delivery of completions on effective sites at the beginning of the plan period.
- 16.8 The site can accommodate up to approximately 90 new homes of a range of type and size (along with up to 30% affordable). In addition, the site will provide informal and formal public open space and a site for a potential new village convenience store.
- 16.9 Wallace requests that the current site at Deacon’s Close is deleted from the Draft Local Plan as it is constrained regarding access and Land at Smithy Brow is allocated.

Recommendation for Modification to the Draft Local Plan

- 16.10 Wallace recommends that the Land off Deacon’s Close is deleted from the Draft Local Plan and Land at Smithy Brow allocated for 90 homes, informal and formal public open space, a new village convenience store and locally equipped area of play to deliver completions within the early part of the plan period.

Table 1. Sustainability Scores for Croft Sites

Site	Integrated Sustainability Score (%)	Economic Sustainability Score (%)	Environmental Sustainability Score (%)	Social Sustainability Score (%)	Parity Score
OS2. Deacons Close, Croft	72	67	71	78	88
Land at Smithy Brow, Croft (Wallace)	81	75	89	80	88

- 16.5 The integrated score of 81% for Land at Smithy Brow compares favourably to only 72% at Deacon’s Close.
- 16.6 Land at Smithy Brow as an allocation to the west of Croft makes a more logical extension to the village, adding to its urban structure to the east of Smith Lane, and thereby balancing the settlement’s built form. Its allocation would also help ease access to the west to Winwick and to the south towards Birchwood and Risley.

This document was prepared by IcenI Projects on behalf of Wallace Land Investments

Delivery | Design | Engagement | Heritage & Townscape
Impact Management | Planning | Sustainable Development | Transport

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**APPENDIX 5:
CHERRY LANE, LYMM REPRESENTATIONS – JUNE 2019**



Land at Cherry Lane, Lymm

Warrington Local Plan Review
Proposed Submission Version: Regulation 19 Consultation
Iceni Projects on behalf of Wallace Land Investments

June 2019

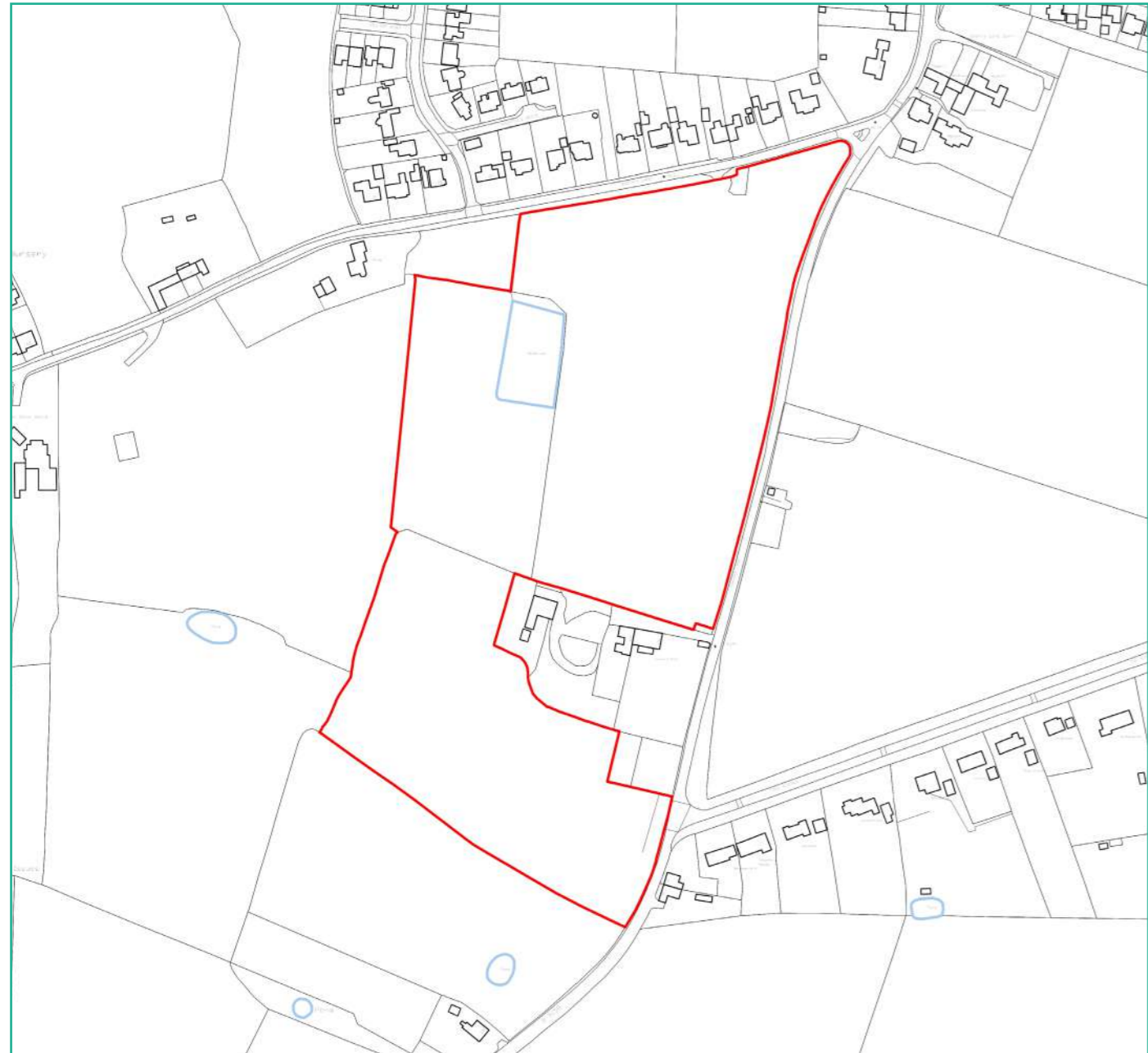


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- 6. Introduction
- 10. Development Vision for Cherry Lane
- 14. Comparing Land at Cherry Lane Against Proposed Allocations
- 24. Overall Conclusion



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Site boundary - 8.6ha / 21.2ac

Figure 1. Site Location Plan



Site boundary

Figure 2. Aerial Site Location Plan

Introduction

1.0 Wallace controls a site off Cherry Lane, Lymm which extends to 8.6 ha (21.2 acres) of land. This site has been subject to a master planning exercise which confirms that it has the potential to provide a sustainable development accommodating the following:

- up to approximately 200 new homes (30% of which are to be affordable);
- informal and formal public open space with locally equipped areas of play, and
- the provision of serviced land for community use such as a new GP Surgery if required or playing fields for Cherry Tree Primary School.

1.2 Wallace prepared representations which were submitted at the Call for Sites (November 2015) Issues and Options (December 2016) and Preferred Development Options (PDO) (September 2017) stages. The representations were supported by a Vision Document demonstrating that the site presents a development opportunity to accommodate a proportion of the overall housing land requirements at Lymm on a sustainable and deliverable site, as part of the Council's development strategy for the its outlying villages.

1.3 Sufficient, suitable and sustainable land needs to be released for future development which meets the future housing requirements set in the Local Plan. As this scale of land release requires greenfield as well as brownfield land as part of the Council's development strategy then it is essential that any choice of greenfield land is based on its merits as sustainable development. If a greenfield site is in the Green Belt then another essential characteristic is the resultant physical nature of the revised Green Belt inner boundaries created.

2. NEED FOR GROWTH IN THE OUTLYING SETTLEMENTS

2.1 The Draft Local Plan defines the scale of housing requirements which the Council considers could be accommodated in each of the outlying settlements - a minimum of 1,085 homes. This is set out in Policy DEV1 - *Housing Delivery* which indicates in Policy DEV1 (4) 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:

- Burtonwood - minimum of 160 homes**
- Croft - minimum of 75 homes**
- Culcheth - minimum of 200 homes**
- Hollins Green - minimum of 90 homes**
- Lymm - minimum of 430 homes**
- Winwick - minimum of 130 homes**

3. LYMM'S POTENTIAL TO ACCOMMODATE FURTHER DEVELOPMENT

3.1 According to the Settlement Profile Document (July 2017) and the emerging Lymm Neighbourhood Plan (October 2018), Lymm has a current population of approximately 12,350 based on the existing 4,961 homes, with a younger demographic profile of 21% under 16, 60% aged 16-60 and 19% over 65 years.

3.2 The proposed allocation of a minimum of 430 new homes at Lymm, presented in the Draft Local Plan, is a reduction from 500 homes previously proposed in the PDO. The proposed settlement expansion is now less than 10% of its current settlement size. At the PDO stage, Wallace highlighted that an allocation of 500 homes was insufficient to address the need for further family and affordable housing in Lymm. Wallace recommended during that PDO consultation, that in order to improve the range and choice of sites, the Council should pursue growth in the order of 15% for Lymm - an allocation in total of around 750 homes.

3.3 Wallace has submitted General Representations to the Draft Local Plan about the need for 20% flexibility to its housing land requirement to ensure that its annual housing land requirement is maintained. This is in accord with the requirements set out in NPPF.

3.4 Because of its demographic profile of predominantly young families and professionals, the lack of availability of a range of type and size of housing continues to be an issue in Lymm. More housing needs to be built in Lymm in order to provide market and affordable homes.

3.5 Wallace has highlighted in its General Representations, that there are delivery issues due to lead-in times; infrastructure and remediation costs with a number of the brownfield sites in the Draft Local Plan's initial plan period (Years 0-5). This will inevitably lead to a delay in the delivery of effective housing land readily available for development at the adoption of the Local Plan. The reduction in the effective brownfield land supply means that more greenfield land within the outlying settlements is necessary to achieve the Council's growth aspirations. Accordingly, greenfield sites which can utilise existing infrastructure capacity and are immediately effective will deliver homes within the early years of the plan period.

3.6 Notwithstanding the concern about the sites currently allocated in the Draft Plan, Wallace maintains that additional sustainable, and effective housing land is required over and above that already identified in the Draft Local Plan. It should be noted that the 20% flexibility requires a further 1,890 homes to be allocated on sites in the Green Belt, given the capacity of the sites in the Urban Capacity is relatively fixed at 13,726 homes. In terms of the future release of sites in the Green Belt, it is proposed that up to 40% should be

allocated to the outlying settlements (750 homes) with the balance (1,140 homes) being delivered from further sites in the South Warrington Garden Suburb.

3.7 As Lymm is 41% of the Council's development strategy in the outlying villages, its housing target should be increased by 310 homes (41% of the proposed increase of 750 homes) to 740 homes in total. This means allocating a minimum of **740 homes for Lymm** as a consequence of **increasing the flexibility allowance from 10% to 20%**. It is recommended that, subject to specific site assessment, the settlement growth for Lymm is increased proportionately to a minimum of 740 homes.

4. SUSTAINABILITY OF THE SITE'S LOCATION IN LYMM

4.1 The strategic location of the Borough between the two city regions of Cheshire and Lancashire means the outlying villages of Warrington offer a highly desirable and attractive location to live. This is represented in Lymm where its average house prices are highest.

4.2 Lymm's market advantage is its proximity to the M6 Junction 20 and the M56 Junction 9. This accessibility makes Lymm an attractive destination. In addition, the A56 offers connections to nearby Altrincham to the west and Grappenhall to the east, and the A50 also provides connections south towards Knutsford and Manchester, and west into Warrington via Grappenhall.

4.3 Lymm has a well performing village centre with a good range of shops, restaurants, bars, and day to day amenities. Vacancy rates for these premises are accordingly low. Located within a short walk of the site is the local primary school (Cherry Tree Primary). The secondary school is located 3km to the north of the site. Lymm village neighbourhood centre is approximately 1.5 km walking distance from the centre of the site. A Post Office, local shop, hotel and public house are located within 600m from the centre of the site.

4.4 Bus services are available throughout the village on the B5158 and on the A56. The nearest bus stop is located within easy walking distance, approximately 500m from the centre of the site. A number of bus services already operate around the site, including hourly services to Warrington. As bus services are a demand led service, the potential increase of the population in this area, allows the opportunity for the bus service and bus stops to be improved and be amended to be closer to the site.

4.5 The site is the closest site to the proposed new employment area as part of the Garden Suburb and also has easy access to both Manchester and Liverpool via the motorway network. This is in contrast to the traffic from the proposed allocations which will have to pass through the centre of Lymm and past the Cherry Lane site to access the motorways.

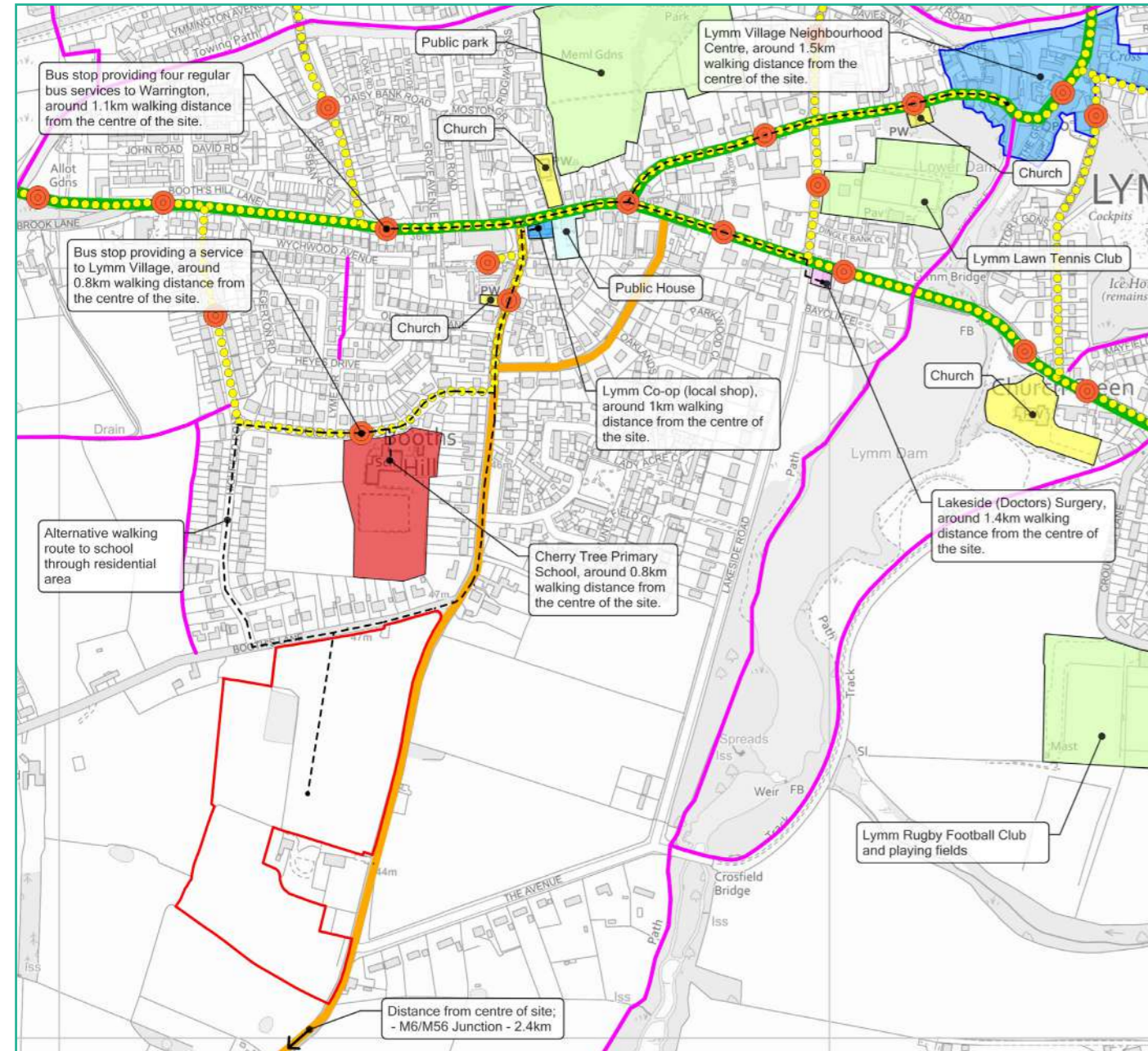


Figure 3. Sustainable Location Plan

- Site boundary
- Lymm Village Neighbourhood Centre
- Land use: School
- Land use: Retail
- Land use: Leisure (hotel, pub etc.)
- Land use: Place of Worship
- Land use: Health
- Land use: Outdoor sports facilities
- 'A' Road
- 'B' Road
- Public Right of Way
- Bus stop
- Bus route
- Walking distance from centre of site

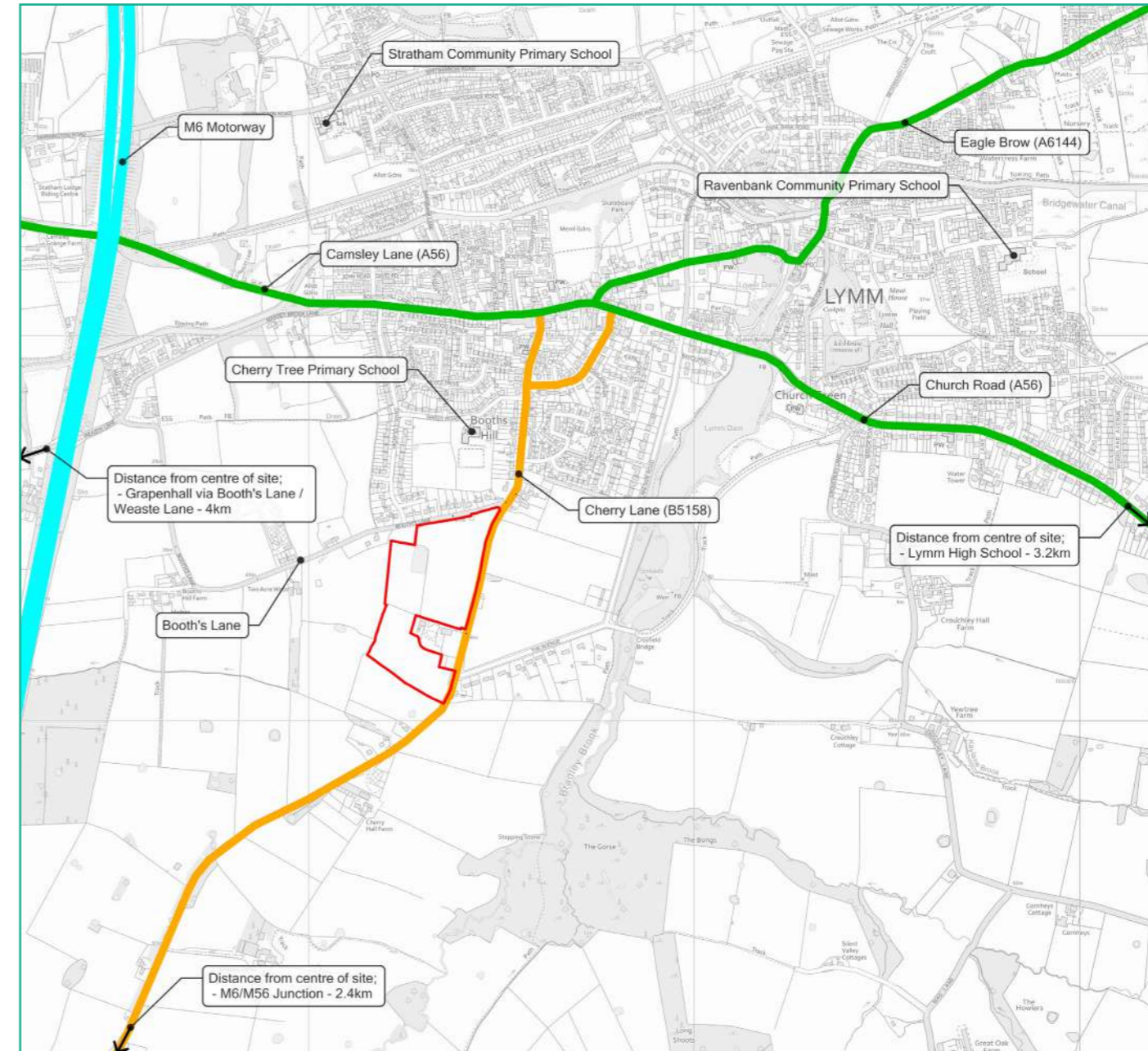


Figure 4. Strategic Site Location Plan

- Site boundary
- Motorway
- 'A' Road
- 'B' Road

Development Vision for Cherry Lane

5. GREEN BELT ALLOCATION

5.1 Wallace is promoting a site at Cherry Lane as an allocation in the Local Plan. It is located to the south of the current built up area. The B5158 Cherry Lane and Booths Lane will provide a clear defensible boundary position to the north and east of the site. Existing field boundaries to the west can be strengthened to form a new inner Green Belt boundary.

5.2 The site was submitted via the Call for Sites in November 2015 and December 2016 (Reference **R18/008**). It was assessed in the 2015 and 2017 SHLAA as part of the ongoing process to identify the Borough’s ‘deliverable’ and ‘developable’ supply of housing land.

5.3 The land off Cherry Lane has been assessed within the 2017 and 2018 SHLAA’s as being ‘constrained’ due to its designation as Green Belt. The Green Belt Study (2016) distinguished Green Belt functionality into four categories:

- No contribution;
- Weak contribution;
- Moderate contribution; and
- Strong contribution.

5.4 The Study assessed the land off Cherry Lane and it is identified within Character Area 8 which is assessed as serving a strong contribution to Green Belt purposes. The Study then went on to assess the individual parcels within the defined character areas. Land off Cherry Lane is identified as reference LY26 and is assessed as providing an overall strong contribution to the function of the Green Belt.

5.5 LY26 is assessed as the following:

- No contribution: to check the unrestricted sprawl of large built-up areas
- No contribution: to prevent neighbouring towns merging into one another
- Strong contribution: to assist in safeguarding the countryside from encroachment
- No contribution: to preserve the setting and special character of historic towns
- Moderate contribution: to assist urban regeneration by encouraging the recycling of derelict and other urban land.
- Overall Contribution: Strong

5.6 The Green Belt Study Addendum (July 2017) assessed all sites that had been submitted as part of the 2016 Call for Sites consultation. Land off Cherry Lane is again assessed as performing a strong contribution to Green Belt purposes.

6. RSK LANDSCAPE ASSESSMENT AND CONCLUSIONS ABOUT CONTRIBUTION TO THE GREEN BELT

6.1 In 2017, RSK was commissioned by Wallace to review Arup’s analysis and categorisation of land off Cherry Lane. The full assessment by RSK was part of the submission to the Council during the PDO consultation in 2017. RSK provided a review of landscape and visual effects based on the broad principles established in best practice guidance.

6.2 The analysis considered the preliminary baseline conditions of the proposed development context but did not attempt to score the significance of potential effects. However, it does identify issues which can be successfully mitigated in the site’s master planning.

6.3 In line with Arup’s methodology, professional judgement was applied to categorise the overall level of contribution to the Green Belt for Land off Cherry Lane. The assessment undertaken by RSK identifies shortcomings in Arup’s analysis especially the durability of the site’s boundaries to the north and east and the potential limited openness of the site particularly to the south. In addition, although there is no development within the site, existing vegetation within the site and adjacent built form enclosing the site on three sides reduces the degree of openness.

6.4 In applying professional judgement, RSK determined that the site at Cherry Lane provides a **moderate contribution** to Purpose 3 rather than **strong contribution** reported by in the Green Belt Study. In light of this, RSK concludes that the overall classification should be amended so that Land off Cherry Lane is categorized as providing a **moderate contribution** to Green Belt purposes.

6.5 This conclusion categorises the site as part of the Green Belt in the same terms as all of the proposed allocations in Lymm for Massey Brook Lane, Rushgreen Road/Tanyards Farm and Pool Lane/Warrington Road.

7. ACCESS

7.1 Vehicular access to the site can be provided from Cherry Lane (B5158) to the east of the site and pedestrian and cycle access from Booths Lane to the north with an easily accessible network of paths and public rights of way.

8. AGRICULTURAL LAND CLASSIFICATION

8.1 The site comprises Grade 3, which is good to moderate quality agricultural land, as described in MAFF (1988) Agricultural Land Classification of England & Wales. This

compares with proposed allocations at Lymm (all comprise Grade 3), and favourably against Rushgreen Road/Tanyards Farm which has better quality farmland (Grade 2 very good).

9. DRAINAGE / FLOODING

9.1 Environment Agency flood mapping confirms that the site is in Flood Zone 1 and therefore is at low risk of flooding.

9.2 An appropriate flood risk assessment will be undertaken as part of a planning application. The proposal will incorporate SUDS measures to ensure that surface water from the proposal meets greenfield run-off requirements.

10. PROPOSAL

10.1 The site presents a sustainable development opportunity to accommodate up to approximately 200 new homes (up to 30% of which will be affordable), as well as serviced land for a community use if required, such as a new GP practice or playing fields for Cherry Tree Primary School. The Council has identified that it will be necessary to expand Cherry Tree Primary School in Lymm and create additional primary care capacity. As the proposed site is within close proximity to the school, Wallace welcomes discussions regarding the potential to incorporate playing fields for Cherry Tree Primary School onto part of the site. The area of land could also accommodate a local GP surgery if the proposed allocation at Rushgreen Road/Tanyards Farm is removed in favour of the site at Cherry Lane.

10.2 A range of 2, 3, 4 and 5-bedroom market houses and affordable housing will be provided. All homes will be accessible within a safe environment. The proposal is designed to integrate with the existing urban character of Lymm. A large area of open space adjacent to the existing village provides a setting to the existing church and historic core of the village. This ensures that the proposal forms a natural extension to the existing community.

10.3 Open space and play space provision is located throughout the proposal and will be in accord with Council requirements.

10.4 The movement hierarchy around the site will provide safe and convenient access for pedestrians and cyclists. It will also provide a safe alternative route to Cherry Tree Primary School. This is achieved through a combination of shared surface lanes and a remote path network. Existing public rights of way to the north of the site have been integrated into the proposal’s pedestrian routes, allowing ease of connection to the wider countryside.

10.5 Structure planting will be provided along the southern and western boundaries of the site, providing a new and defensible inner boundary for the Green Belt. The structure planting will provide visual screening and an attractive edge to the development.

10.6 The structure planting will incorporate rural paths around the edge of the proposal, with regular links into the proposal and easy access opportunities to the surrounding countryside. The structure planting around the site will also help promote biodiversity and form a key element in the establishment of new wildlife habitats and corridors in the area.

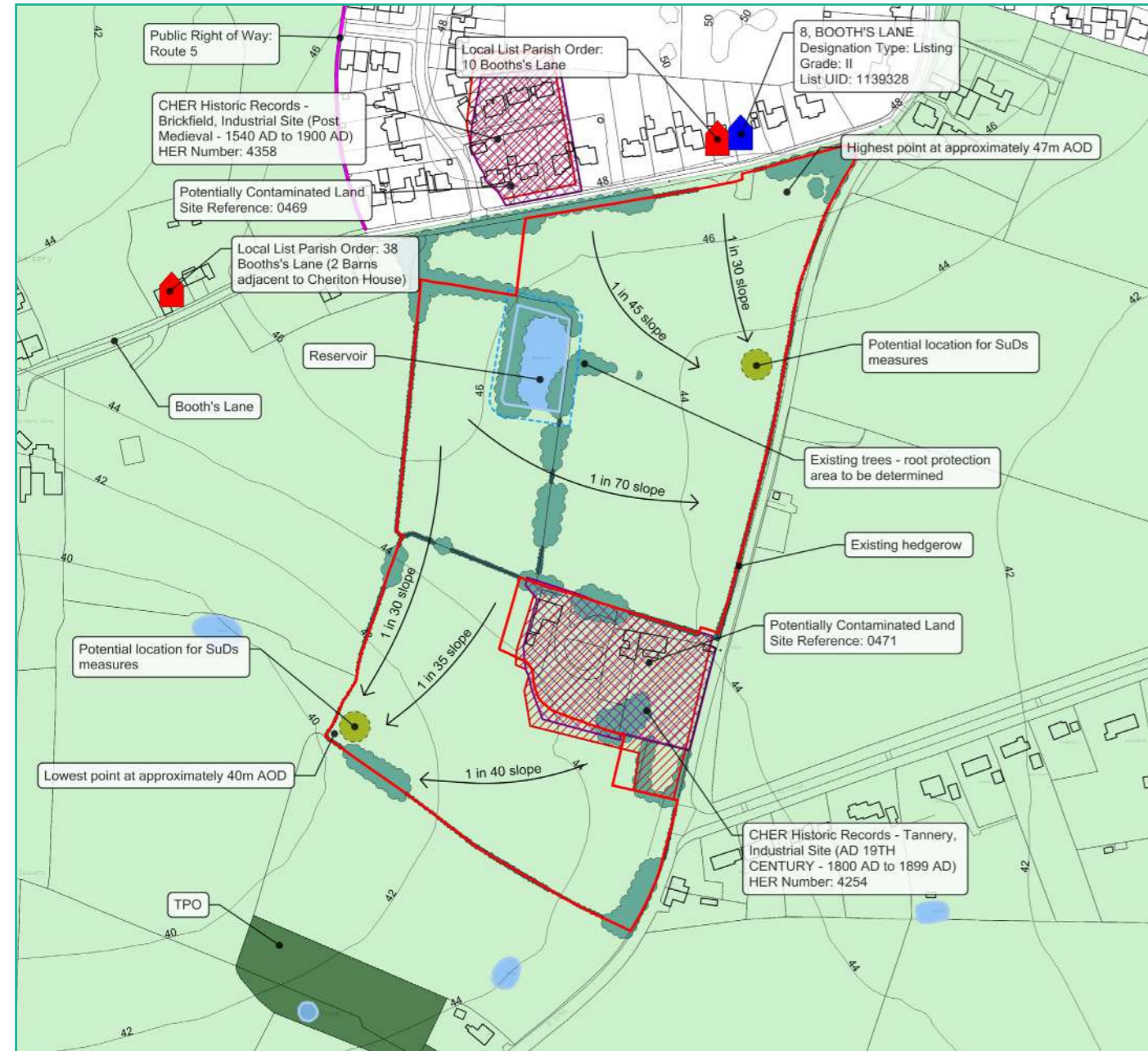
10.7 The proposal will maximise the future prospects of success in attracting new investment to Lymm and maintaining and enhancing existing services.

11. PHASING

11.1 The development trajectory set out in the Draft Local Plan identifies all the sites in the outlying settlements coming forward in Years 6-10 (2022-2027) with the majority of the completions in Council’s development strategy coming forward in 2023-2025 from brownfield completions. Wallace has provided evidence in their General Representations to the Draft Plan that there is a reliance on sites identified within the Town Centre and the Waterfront coming forward in years 1-5.

11.2 Wallace considers that some of the Town Centre sites are constrained by ownership, access and long lead-in times for construction. The Waterfront allocation is heavily constrained and requires significant infrastructure to allow sites to come forward at the start of the Plan period. Wallace maintains that there needs to be a controlled release of housing land in the outlying settlements and that the early release of Green Belt sites, will help to ensure that the supply of housing is spread more evenly throughout the Plan period and help to maintain a rolling 5-year effective housing supply.

11.3 The House Builders Federation (HBF) position is that when selecting housing sites for allocation, the Council should select the widest possible range of sites by both size and market locations to provide suitable land for small local, medium regional and large national housebuilding companies. Land at Cherry Lane provides a readily available and sustainable site that can be delivered within the first 5 years of the Plan period.



- Site boundary
- CHER Historic Records
- Potentially Contaminated Land (Warrington Borough Council Policies Map)
- Environment Agency existing waterbody 8m buffer
- Green Belt
- Tree Preservation Order (TPO)
- Existing waterbody
- Existing trees
- Existing hedgerows
- Public Right of Way
- Grade II Listed Building
- Locally Listed Buildings: Local List Parish Order
- Potential location for SuDS measures size and location to be determined by engineer
- Direction of slope
- Existing contours - 2m intervals

Figure 5. Site Opportunities & Constraints Plan



- Site boundary - 8.6ha / 21.2ac
- Potential developable area (5.69ha / 14.06ac)
- Frontage
- Potential open space provision
 - Amenity open space
 - Meadow grassland
- Indicative area for community use such as school playing fields or medical practice etc
- Potential location for SuDS measures
- Existing trees
- Potential tree planting
- Potential tree line
- Existing waterbody
- Existing watercourse
- Neighbourhood street
- Lane
- Path
- Potential pedestrian connection to primary school walking route
- Node
- Potential location of play area
- Vehicular access

Figure 6. Indicative Development Framework

Comparing Land at Cherry Lane Against Proposed Allocations

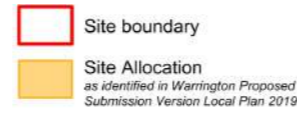
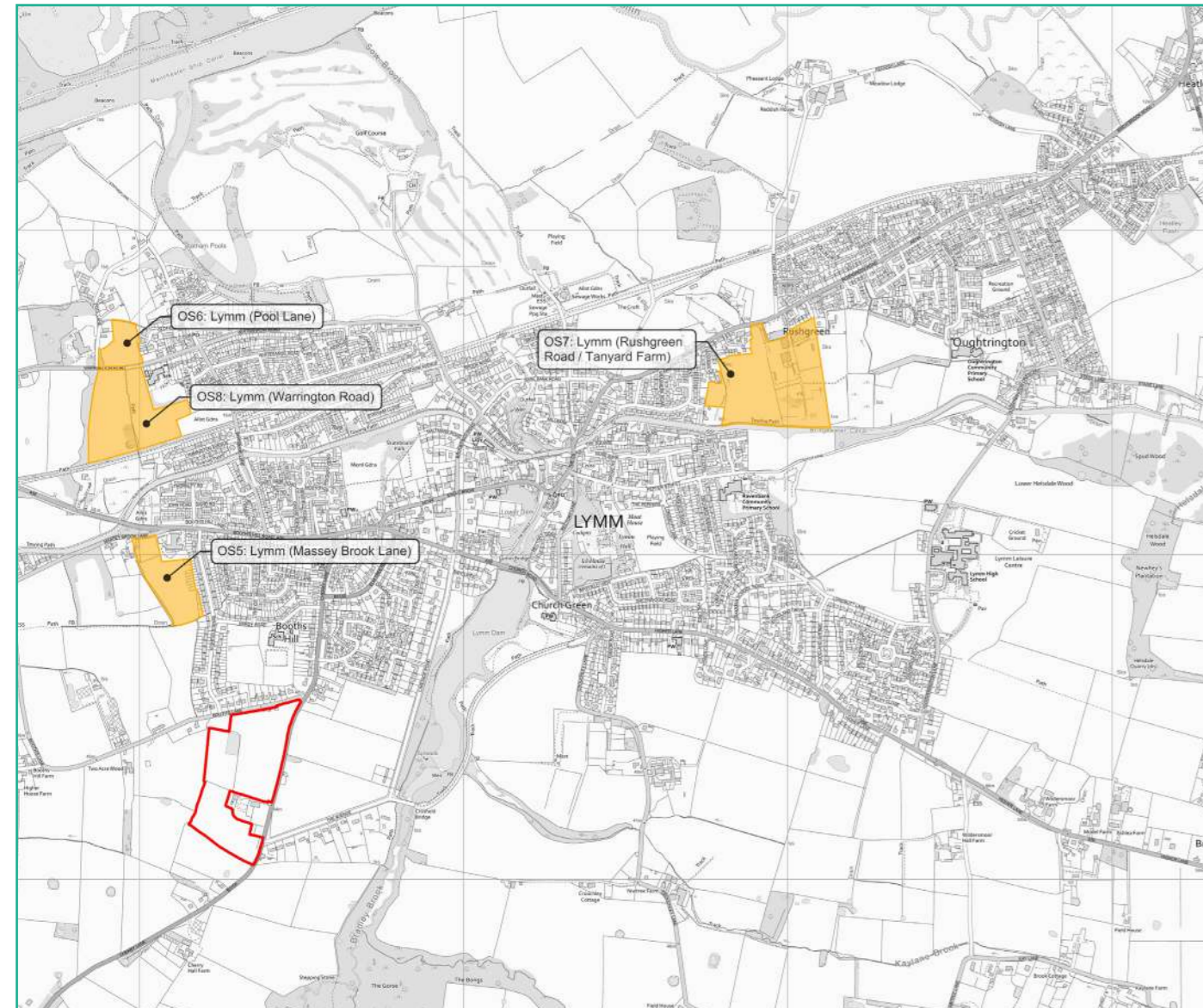


Figure 7. Proposed Allocations Plan | Lymm

12. PROPOSED SITE ALLOCATIONS

12.1 Warrington Borough Council is currently proposing four sites in the Draft Local Plan to meet the housing land requirement of **a minimum of 430 homes for Lymm**:

1. **Massey Brook Lane - 60 homes (Ref: OS5)**
2. **Rushgreen/Road/Tanyards Farm - 200 homes (64 consented) (Ref: OS7)**
3. **Pool Lane - 40 homes (Ref: OS6) and**
4. **Warrington Road - 130 homes (Ref: OS8)**

12.2 The Local Plan policies confirm that all allocated sites need to be able to provide a range of housing types and sizes, of which 30% is affordable, at a density of 30 dph. The Draft Local Plan is seeking a financial contribution to community facilities; open space provision; transport improvements and enhancement of natural resources.

12.3 Wallace is concerned that the Council's choice of sites in its development strategy for Lymm has failed to select the most sustainable locations. Accordingly, Wallace has further examined each of the proposed allocated sites for Lymm and compared the sustainability of each site compared with Wallace's site at Cherry Lane.

13. SUSTAINABILITY | SCORECARD ASSESSMENT

13.1 To provide a comparable sustainability assessment, Wallace has utilised the 'Sustainable Development Scorecard'; a tool developed by the Sustainable Development Commission chaired by former Planning Minister Nick Raynsford. The Scorecard provides a basis to assess development proposals with the 'golden thread of sustainable development' running through them, providing a quantitative assessment of sustainable development credentials, as defined by the National Planning Policy Framework.

13.2 The Scorecard is intrinsically based within the context of the NPPF and its three equal pillars of environmental, economic and social sustainability. The Scorecard results are broken down into two scores; an overall 'Sustainability Score' which assesses the total contribution from each of the three pillars, and a 'Parity Score' which determines how balanced the contribution is from each of the three pillars.

13.3 As the analysis is based on the site's location and specific development proposals, the assessment is bespoke to each development in question, setting the Scorecard apart from other sustainability certification schemes. Given the great importance that is attributed to existing policy, Green Belt consideration is not included within the Sustainable Development Scorecard.

13.4 **When assessed, Land at Cherry Lane, Lymm was found to have a total integrated sustainability score of 83%** and when broken down, its economic score was 80%, environmental 88% and social 82%. The parity score is 93% demonstrating an even balance between the three scores.

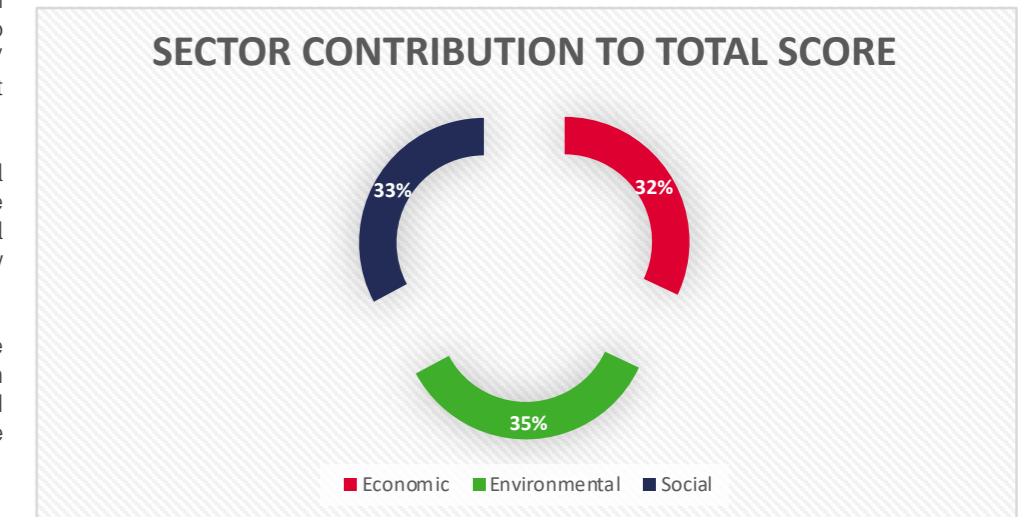
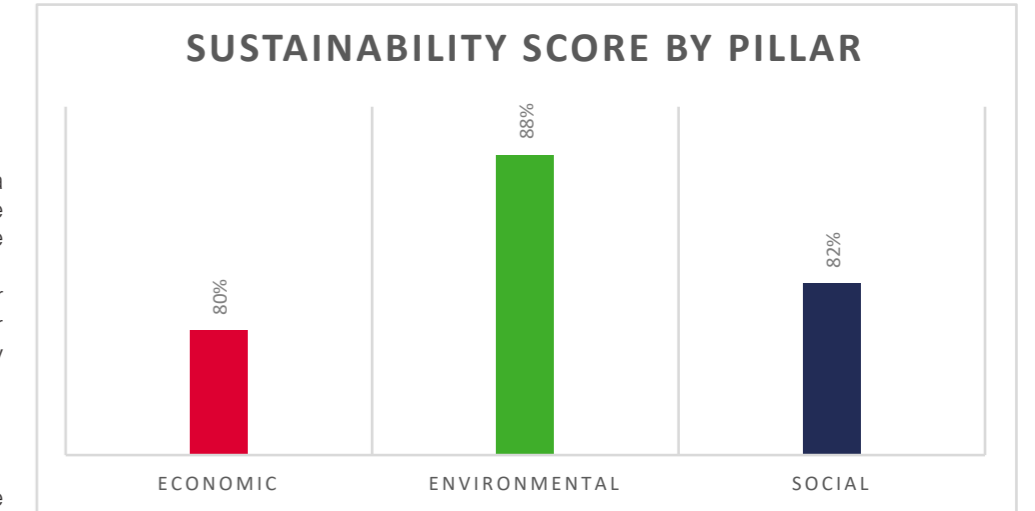


Figure 8. Sustainable Development Scorecard Results. Land Cherry Lane, Lymm

Comparing Land at Cherry Lane Against Proposed Allocations

13.5 The score presented in this initial assessment is subject to change as it is based on initial development proposals but it is anticipated to increase as proposals are further refined.

14. SUSTAINABILITY ASSESSMENT OF WARRINGTON BOROUGH COUNCIL SUSTAINABILITY APPRAISAL (SA)

14.1 Icen have conducted a review of the Warrington Borough Council Sustainability Appraisal. The site being proposed by Wallace at Land at Cherry Lane, Lymm has not been assessed by the Council. Although this has been allocated reference numbers, based on the 2015 SHLAA, Call for Sites (2017) and Call for Sites (2018), no reference has been made to it in the Sustainability Appraisal. Accordingly, it has not been possible to appraise the site and compare its suitability and sustainability against the sites being allocated in the Draft Local Plan.

14.2 This oversight is unacceptable and Wallace requests that the site is fully assessed and that the Land at Cherry Lane, Lymm is included as part of the Council's Sustainability Appraisal. It is argued that its omission at present means that the site has been unfairly disadvantaged.

15. REVIEW OF POLICY OS5 - MASSEY BROOK LANE (60 HOMES)

15.1 Massey Brook Lane is situated to the west of Lymm and is allocated for 60 homes at a density of 30 dph. The following highlights issues associated with the proposed allocation of this site:

1. Sustainability of the Proposed Allocation
2. Strength of resultant Green belt Boundaries and
3. Effectiveness of the Allocated Site

15.2 These issues fundamentally impact on the underlying reasons for this site's allocation in the Proposed Local Plan.

Sustainability of Proposed Allocation

15.3 Using the Sustainability Scorecard, when assessed, the land at Massey Brook Lane, Lymm was found to have a **total integrated sustainability score of 75%** and when broken down, its economic score was only 67%, environmental 78% and social 80%. This compares to a total integrated sustainability score of **83%** for Cherry Lane.

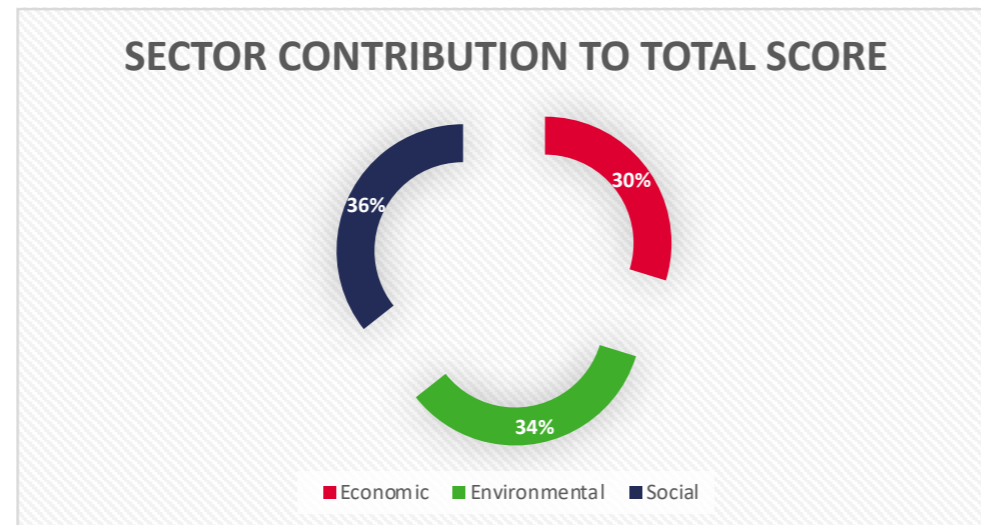
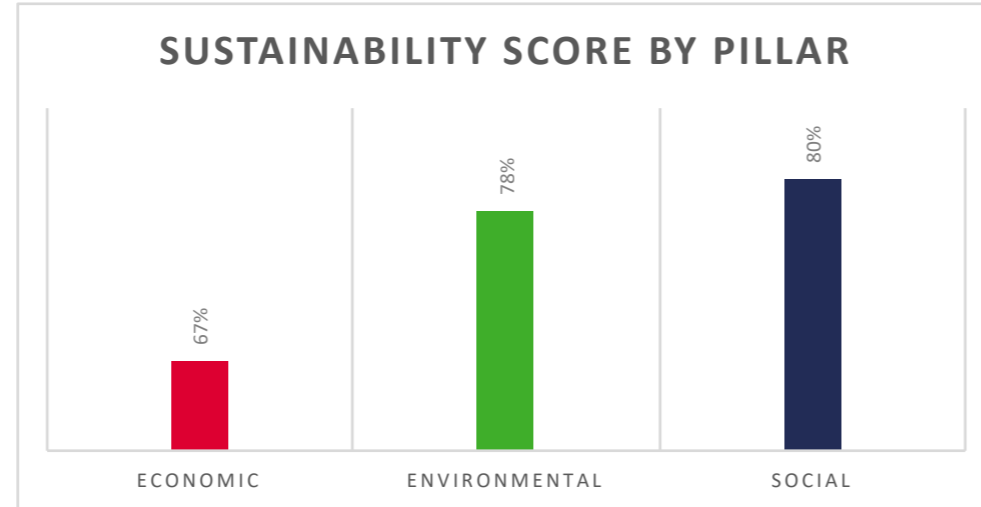


Figure 9. Sustainable Development Scorecard Results. Land Massey Brook Lane, Lymm

Strength of resultant Green belt Boundaries

15.4 The Draft Local Plan policy identifies that a landscape scheme will be required that retains and enhances trees and hedgerows along all of its boundaries, particularly the woodland along the western boundary for this allocated site.

15.5 The allocated site at Massey Brook Lane is within Parcel LY27 and is assessed as making a **“moderate contribution”** overall with a **Strong Contribution** under **Purpose 3 to safeguard the countryside from encroachment.**

Reasoning: “The parcel is connected to the settlement along its eastern boundary. This consists of hedge lined garden boundaries which are not durable and would not be able to prevent encroachment into the parcel. The parcel is well connected to the countryside along durable boundaries consisting of Massey Brook Lane and Booth’s Lane. The existing land use mainly consists of open countryside and there is moderate vegetation mainly consisting of internal hedgerows. Built form consists of a garden centre and around eight residential properties in the south of the parcel, around the same number of properties in the north and a residential care home in the west, totalling less than 10% of the land area. The parcel helps to prevent further residential encroachment. The parcel supports long line views and overall supports a strong degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment.”

15.6 Based on the reasoning set out above and a review of this proposal confirms that the resultant boundaries of the Green Belt remain weak and would allow further encroachment into the Green Belt especially to the south and west.

Effectiveness of the Allocated Site

15.7 As the Draft Policy highlights, the allocation of this site requires... **A package of transport improvements will be required to support the development.**

15.8 Given the surrounding road network, it is evident that a significant issue facing the immediate delivery of the site is its access. The Draft Local Plan indicates that access to the site will be via Massey Brook Lane. Massey Brook Lane is a narrow lane (at approximately 5m wide) and connects with the A56 at an acute angle with a considerable grade difference.

15.9 Given the level differences for this junction, this presents a real difficulty in pulling out into oncoming traffic. This also means that it is unlikely to be easily upgraded if a road capacity test were to determine that a suitable upgrade is required. Visibility to the left is obstructed

when a bus is waiting at the adjacent bus stop. As such, an intensification of the use of this junction with the existing layout would not be appropriate.

15.10 In addition, accessing this site will largely mean that additional traffic is pulled through the centre of Lymm travelling from east to west. This will exacerbate any local queuing of junctions in the centre of the town which is already extremely busy especially at peak times. This will exacerbate air with additional emissions in the town.

15.11 Wallace considers that it an appropriate package of transport measures may not be deliverable by this proposal if its access arrangements are not resolvable.

15.12 The supporting text states that site is relatively unconstrained and that it can be delivered in the early part of the Plan period. Wallace confirms that the site access is constrained and that major junction improvements will be necessary to allow safe access to the site. Evidence of such transport improvements will be required at Examination in Public in order to prove that the site at Massey Brook Lane is deliverable without harm to the safety of road users and that the site can be delivered early in the Plan process.

16 CONCLUSION

16.1 Whilst the policy states that the site performs well against the objectives of the Local Plan, the NPPF and the Local Plan Sustainability Appraisal, the evidence led by Wallace confirms that the alternative site at Cherry Lane is more sustainable (despite the site not being assessed in the Local Plan Sustainability Appraisal) using the Sustainability Scorecard.

16.2 The Cherry Lane site is not constrained in terms of access and can come forward for development immediately following the Local Plan adoption.

16.3 Given the evidence summarised above, Wallace concludes that the allocated site at Massey Brook Lane is not immediately available and consequently, is potentially non-effective as an allocation to come forward during first five years of the plan period given constraints associated with its access and its cumulative impact on traffic congestion and potential deterioration of air quality in the centre of Lymm.

16.4 Wallace recommends that the allocated site at Massey Brook Lane should be deleted.

17. REVIEW OF POLICY OS7. RUSHGREEN ROAD/TANYARDS FARM (200 HOMES)

17.1 The site is located to the north east of Lymm in the gap between Lymm and Rushgreen/

Comparing Land at Cherry Lane Against Proposed Allocations

Outrighton. It is bounded by Rushgreen Road, Tanyards Farm and the Bridgewater Canal and has been allocated for a minimum of 200 new homes and a new health centre.

17.2 Planning permission for 64 new homes on part of the site at Tanyards Farm (2017/31816) was won on Appeal (5th September 2018 - APP/M0655/W/18/3200416). This leaves a balance of 136 new homes on this site together with the provision of a new health centre.

17.3 The following highlights issues associated with the proposed allocation of this site:

1. Sustainability of the Proposed Allocation, and
2. Adverse impacts arising from the Site's allocation
3. Effectiveness of the Allocated Site

17.4 These issues fundamentally impact on the underlying reasons for this site's allocation in the Proposed Local Plan.

Sustainability of Proposed Allocation

17.5 Using the Sustainability Scorecard, when assessed, the land at Rushgreen Road/Tanyards Farm, Lymm was found to have a **total integrated sustainability score of 75%** and when broken down, its economic score was 71%, environmental 75% and social 81%. The parity score is 90%. This compares to a total integrated score of **83%** for Cherry Lane

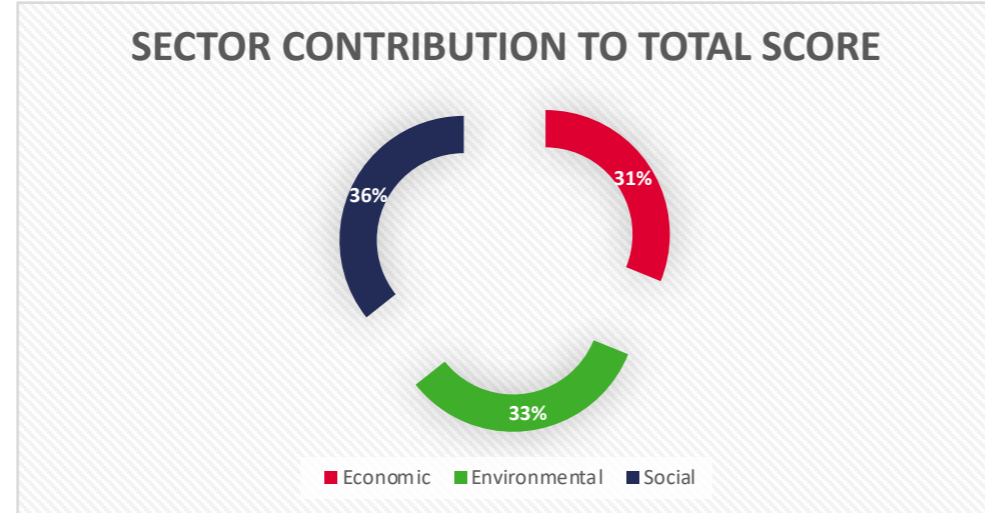
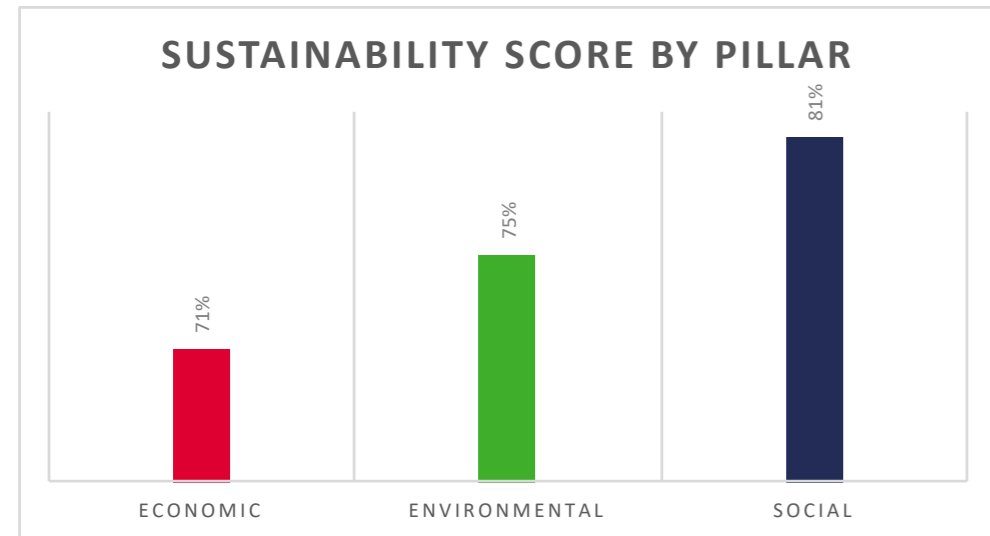


Figure 10. Sustainable Development Scorecard Results. Land at Rushgreen Road/Tanyards Farm, Lymm

Adverse Impacts arising from the Site's allocation

17.6 The Heritage Impact Assessment (HIA) identifies that the site has a "moderate contribution" and harm to the setting of Grade II Listed Tanyards Farmhouse and that its ... **allocation for development may result in tall buildings in very close proximity to the asset adversely intruding within the setting of the asset via the gaps between properties (page 22).**

17.7 In terms of the Arup Green Belt Study (2016), the Rushgreen Road/Tanyards Farm allocated site performs a ...**strong contribution to safeguard the countryside from encroachment.** (page H7).

The parcel is well connected to the settlement on three sides along its northern, western and eastern boundaries. These predominantly consist of garden boundaries which would not be durable enough to prevent encroachment into the parcel. The parcel is connected to the countryside on one side. This consists of the Bridgewater Canal, which is durable enough to prevent encroachment beyond the parcel if the parcel was developed. The existing

land use mainly consists of open countryside with moderate vegetation. There is also a mix of greenhouses used for agriculture and warehouses, with hedgerows separating the parcel into several sections. There is one residential property in the south western corner of the parcel and another in the north. The parcel supports some long line views looking south and overall supports a strong to moderate degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment (page H7).

17.8 Wallace is concerned that the issue of encroachment has not been properly considered for the whole of the allocated site at Rushgreen Road/Tanyards Farm. This issue was raised as part of the determination of the Appeal site, forming part of the allocated site.

17.9 It should be noted that the Inspector for the Appeal addressed this issue of encroachment. The Inspector concluded that the Appeal Site (part of the proposed allocated site) is situated on the settlement fringe and by reason of existing Previously Developed Land (PDL), there is already some encroachment and loss of openness. The Inspector concluded that part of the appeal site (the former nurse close to the Sainsbury's supermarket) is a discrete parcel of land.

17.10 In the determination of the appeal, concerns were raised by the local communities over the coalescence of Lymm with Oughtrington, currently separated by a significantly larger wedge of Green Belt. The Inspector concluded ...*I appreciate that local residents cherish the locally distinct identity of Oughtrington and Lymm, and I have considered carefully whether or not the proposed development [part of the allocated site] would result in a merging of these settlements.*

17.11 However, the decision to allow the appeal site stressed the need for the rest of the proposed allocation to be ...**permanently open, and a gap between Oughtrington and Lymm should be maintained (Inspectors Report 5th September 2018 - APP/M0655/W/18/3200416)**

17.12 The maintenance of this strategic gap as a wedge in the Green Belt is crucial to avoid the coalescence of the two settlements of Lymm and Oughtrington, as highlighted by the Inspector and the local Parish Councils.

17.13 If this is the future requirement for the development of this proposed allocated site then its overall capacity of 136 homes cannot be achieved on the site and its scale of development needs to be significantly reduced.

Effectiveness of the Allocated Site

17.14 The Options and Site Technical Report also states that there are "suitability issues due to the eastern half of the site being potentially contaminated land, and the GP services in Lymm have no available capacity". The allocation of the site however requires a site for a new primary health care facility of a minimum of 1,500 sq.m. should be provided.

17.15 The Draft Policy highlights, the allocation of this site requires... **The delivery of a new primary care health facility is therefore a key requirement of the development. The final size and nature of the facility will need to be confirmed with the Warrington Clinical Commissioning Group (CCG).**

17.16 The policy's supporting text states that site is relatively unconstrained and that it can be delivered in the early part of the Plan period. Wallace believes that the part of the site already granted permission on Appeal together with the requirement for a new Health Centre could be included as an allocation in the Local Plan. However, further evidence will be required at Examination in Public in order to prove that the remainder of the site at Rushgreen Road/Tanyards Farm site (or a smaller part of the site) can be delivered early in the Plan process.

17.17 In terms of access to the remainder of the site, any further housing would be served by a single access which was approved at Appeal, with the access junction sited closer to the existing Sainsbury's access than is ideal. Capacity testing would need to confirm if a simple T junction is a suitable form of access or a more substantial junction is required to accommodate the balance of the housing along with the Health Centre. The Draft Policy highlights, ...**Contributions towards infrastructure provision will be secured to ensure that Lymm's infrastructure/services can support the level of population growth.** ...

18. CONCLUSION

18.1 Clearly the part of the site close to Sainsbury's and forming part of the previously developed land of the former nursery has permission granted on Appeal. An extension to this solely to accommodate a new Health Centre could be considered for release from the Green Belt as already identified.

18.2 It is also evident that the Inspector considered the rest of the site stretching down to the Bridgewater Canal plays an important role in the physical separation of the settlements of Lymm and Oughtrington and should be retained in the Green Belt. It is now evident that only a much smaller part of the proposed site should be allocated for further development.

Comparing Land at Cherry Lane Against Proposed Allocations

18.3 The results of the sustainability appraisal carried out to compare the proposed allocation with Cherry Lane, Lymm concluded that the site at Rushgreen Road/Tanyards Farm is less sustainable with an integrated score of **75%** compared to **83%** at Cherry Lane.

18.4 Given the evidence summarised above, Wallace concludes that the balance of the site should be retained in the Green Belt to maintain the physical separation of Lymm and Oughtrington, unless proven otherwise. Wallace submits that the balance of the allocation (circa 150 homes) can be met at the proposed site at Cherry Lane.

19. REVIEW OF POLICY OS6. POOL LANE (40 HOMES) & POLICY OS8. WARRINGTON ROAD (130 HOMES)

19.1 When considering the proposed allocations at Pool Lane and Warrington Road, their close proximity will have a cumulative impact if developed. Both sites are located to the north west of Lymm with Pool Lane being allocated for a minimum of 40 new homes and Warrington Road for a minimum of 130 new homes. Both sites are suggested to come forward quickly within the first 10 years of the Plan period.

19.2 Both sites are accessed off Warrington Road which is a minor road providing access to the west from housing to the north of Lymm onto Warrington via a connection to the A56.

19.3 The following highlights issues associated with the proposed allocation of this site:

1. Sustainability of the Proposed Allocation
2. Adverse impacts arising from the Site's allocation
3. Effectiveness of the Allocated Site

19.4 These issues fundamentally impact on the underlying reasons for this site's allocation in the Proposed Local Plan.

Sustainability of Proposed Allocation

19.5 Using the Sustainability Scorecard, when assessed, the land at Pool Lane, Lymm was found to have a **total integrated sustainability score of 73%** and when broken down, its economic score was only 66%, environmental 75% and social 79%. The parity score is 87%. The site at Warrington Road, Lymm was found to have a **total integrated sustainability score of 74%** and with its economic score also only 66%, environmental 76% and social 79%. These compare to a total integrated score of **83%** for Cherry Lane

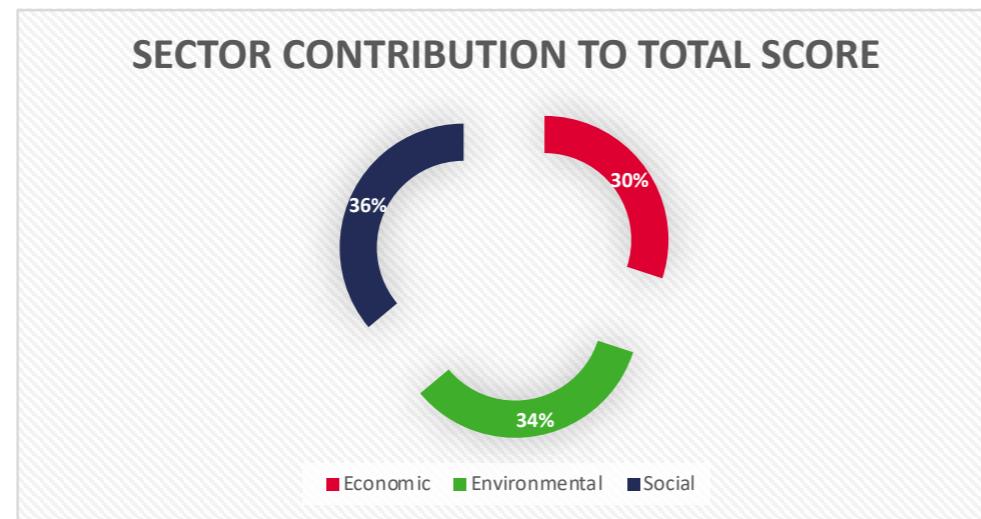
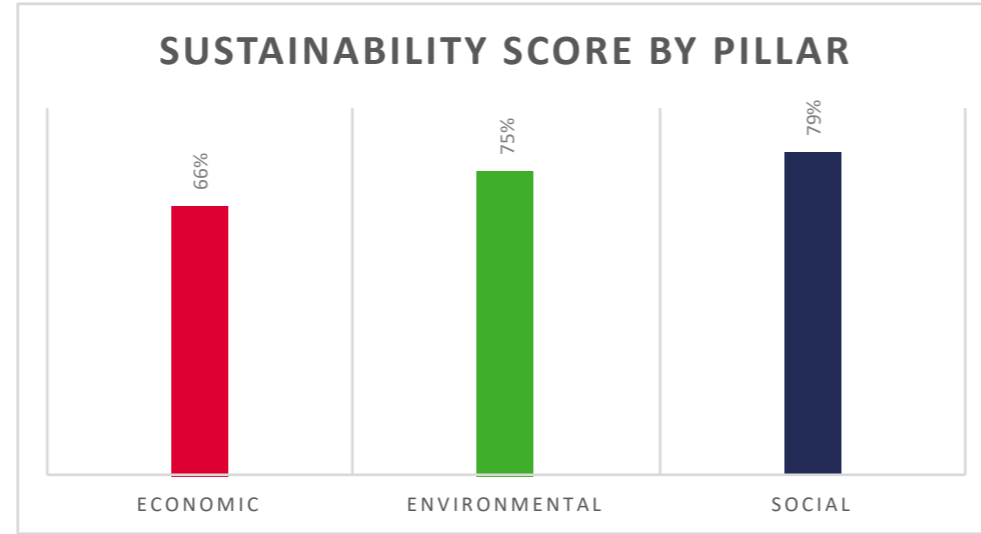


Figure 11. Sustainable Development Scorecard Results. Land at Pool Lane, Lymm

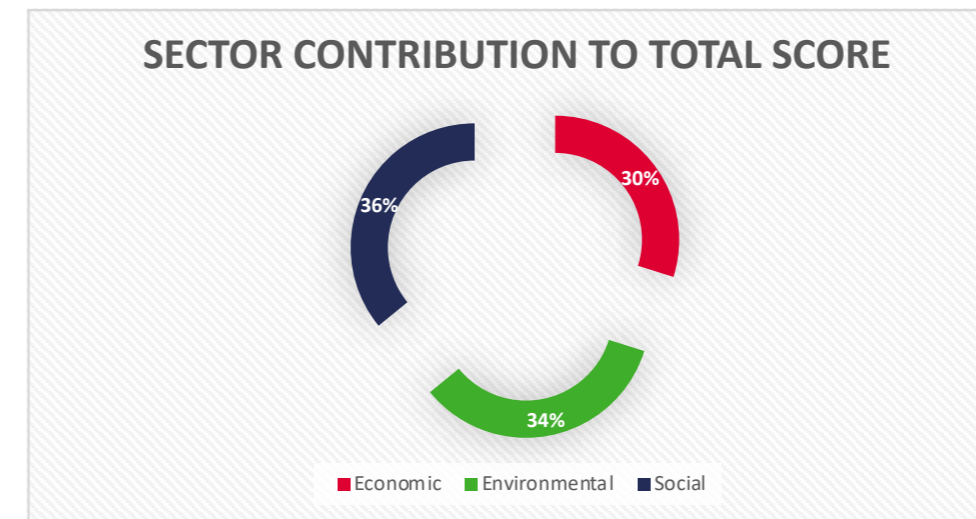
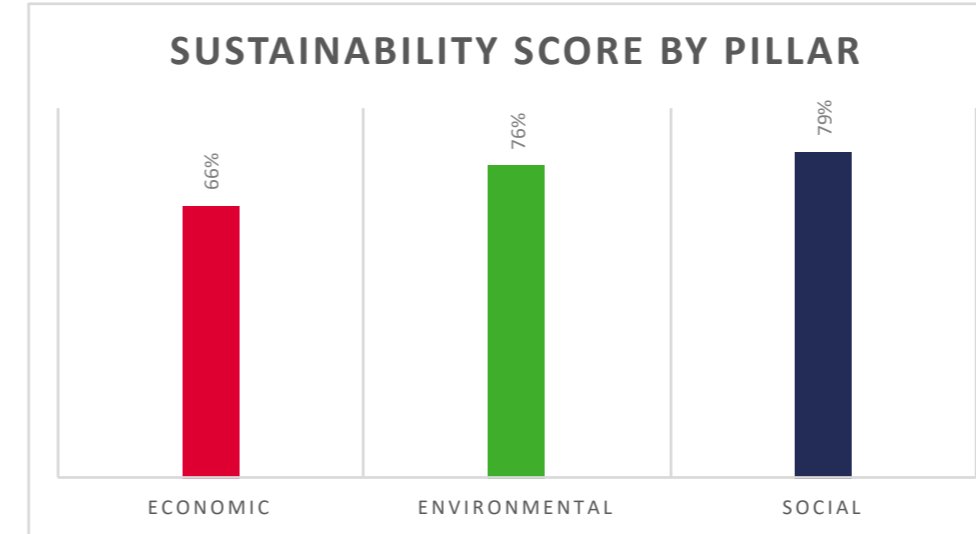


Figure 12. Sustainable Development Scorecard Results. Land at Warrington Road, Lymm

Adverse Impacts arising from the Site's allocation

19.6 Wallace considers that the cumulative traffic impact from the allocation of a minimum of 170 homes from this part of Lymm has been understated.

19.7 All traffic from these proposed allocations, not bound for Warrington, require to travel through the centre of Lymm to reach destinations to the east and south. This will increase peak hour traffic movements, lead to greater congestion and delays, with access to the centre of Lymm being via Star Lane/Barsbank Lane to the A56 or via Whitbarrow Road.

19.8 The traffic from these two proposed allocations also increase peak hour traffic movements in the vicinity of Statham Community Primary School, where on-street parking associated with the School is already known to be an issue.

19.9 In addition, the Local Plan Heritage Impact Assessment (HIA) identifies that the sites, and in particular Pool Lane, will also cause moderate harm to the Grade II Listed Statham Lodge unless mitigated with the outlined measures.

Reasoning: "Allocation of the Pool Lane site for development may result in loss of rural setting of the asset. Its allocation for development may result in residential properties in close proximity to the asset adversely intruding within the setting of the asset via the 11 gaps in screening" Warrington Road's "allocation for development may result in residential properties in close proximity to the asset adversely intruding within the setting of the asset via the gaps in screening, resulting in slight harm to the significance of the asset."

19.10 The HIA also identifies a slight impact upon the significance of the locally listed Pool Lane Cottages, Pool Farm and moderate impact on the significance of the locally listed Star Inn Public House. The emerging Lymm Neighbourhood Plan and Lymm Heritage and Character Assessment has highlighted the need to protect the heritage and character of Lymm from adverse development.

19.11 In respect of the assessment of Green Belt, the allocated site at Pool Lane lies within Parcel LY2 and is found to make a **"moderate contribution"** and Parcel LY3 which covers the Warrington Road site has elements identified as making a **"strong contribution"**. Overall, both sites make a strong contribution to safeguarding from encroachment into the countryside due to its openness and the weak boundaries between the parcels and the settlement.

Comparing Land at Cherry Lane Against Proposed Allocations

19.12 The Options and Site Assessment Technical Report also show that there are “suitability issues as the sites are within Flood Zone 2” and “adjacent to an area of potentially contaminated land to the east”.

19.13 It is evident (and proven from a site visit) that the background noise levels from traffic on the M6 Motorway are high. Without demonstration that adequate mitigation can be provided, traffic noise will have an adverse effect on the amenity of any outdoor space within the proposed development, including gardens and play spaces.

19.14 All of the above issues confirm that the proposed allocation of these two sites promote adverse environmental and other impacts for which the mitigation is not yet known.

Effectiveness of the Allocated Site

19.15 The Options and Site Technical Report states that there are suitability issues as Pool Lane is within Flood Zone 2, that the site is “adjacent to an area of potentially contaminated land to the east”, and that “GP services have no available capacity in Lymm.

19.16 The Draft Policy highlights, that there needs to be a comprehensive package of contributions made towards, education, primary care, open space and leisure facilities. The policy also states that the **design of the development must incorporate appropriate measures to mitigate noise impacts from the adjacent Statham Lodge Hotel.** The allocation of this site also requires... **A package of transport improvements ... to support the development.**

19.17 The policy supporting text states that site is relatively unconstrained and that it can be delivered in the early part of the Plan period. However, further evidence will be required at Examination in Public in order to prove that it is deliverable in the early years of the Plan.

20. SUMMARY

20.1 Given the evidence presented above, Wallace concludes that the Integrated Sustainability Score for Pool Lane of **73%** and Warrington Road at **74%** is lower than the **83%** achieved at Cherry Lane as demonstrated in the Sustainability Checklist.

20.2 The Council’s own evidence from its Green Belt Study is that the proposed allocations do not fully meet the requirements and necessary criteria to be released from Green Belt. In particular, the proposed allocation at Warrington Road is part of parcel LY3 and performs a **Strong Contribution** to the purposes of Green Belt as independently assessed in the Green Belt Study (2016).

20.3 There are identifiable constraints associated with both proposed allocated sites especially in terms of access and the resultant cumulative impact of traffic and pollution in the centre of Lymm.

20.4 Wallace concludes that the proposed allocation at Pool Lane for 40 homes should be removed from the Draft Local Plan due to its lack of sustainability and adverse impacts on its locality.

20.5 Wallace concludes that the proposed allocation at Warrington Road for 130 homes is in a sustainable location but, taking into account the proposal’s adverse effect on the Green Belt, then the proposed allocation should be reduced in size to minimise the impact on traffic on Lymm town centre.

Overall Conclusion

21. CONCLUSION

- 21.1 Wallace agrees that greenfield sites in the Green Belt are required to meet the housing targets to achieve the growth aspirations of the Council’s development strategy.
- 21.2 Wallace considers that the amount of land allocated for development in Lymm should be increased if its agreed that the Local Plan needs to accommodate a 20% increase in flexibility rather than 10% as proposed. This results in an overall increase of 1,890 homes to be accommodated on Green Belt sites. It is proposed that the Council’s development strategy be modified with 40% of this increase allocated to the outlying settlements (750 homes) and South Warrington Garden Suburb accommodating the balance of 60% (1,140 homes).
- 21.3 It is proposed that the development strategy for the outlying villages requires to be modified proportionately with Lymm’s minimum requirement increasing from 430 homes (41% of the proposed scale of additional housing) to 740 homes. In the event that the proposed allocations remain the Plan, Wallace submits that there is a shortfall of approximately 310 homes to be met in Lymm. This is a proposed overall settlement increase of around 15% to meet existing housing need and demand.
- 21.4 Wallace has proved and substantiated using the Sustainable Development Scorecard that the Cherry Lane site is more sustainable, deliverable and more appropriate than the proposed allocations for Lymm, especially the two sites allocated at Pool Lane (40 homes) and Warrington Road (130 homes). This is confirmed in the following table where using all criteria Cherry lane has the highest scores:

Site	Integrated Sustainability Score (%)	Economic Sustainability Score (%)	Environmental Sustainability Score (%)	Social Sustainability Score (%)	Parity Score
Cherry Lane, Lymm (Wallace)	83	80	88	83	93
OS5. Massey Brook Lane, Lymm	75	67	78	80	87
OS7. Rushgreen Road/Tanyards Farm	75	71	75	81	90
OS8. Warrington Road, Lymm	74	66	76	79	87
OS6. Pool Lane, Lymm	73	66	75	79	87

- 21.5 The site at Cherry Lane, Lymm is clearly the most sustainable site compared to the proposed allocations across the rest of the settlement.
- 21.6 In addition, Wallace has commissioned a review by RSK of the Green Belt Study. This confirms that the site at Cherry Lane makes a **moderate contribution** to the 5 purposes of Green Belt, as set out in the NPPF. The site at Cherry Lane does not make a significantly greater contribution to the Green Belt than the other sites allocated in the Draft Local Plan.
- 21.7 The site can accommodate up to approximately 200 new homes of a range of type and size and up to 30% affordable housing.
- 21.8 The site is within easy walking distance of the centre and traffic can access the M6/M56 at the Lymm interchange and onwards towards Warrington to the west and Knutsford and the east via the A50. In contrast with the proposed allocations at Massey Brook Lane, Pool Lane, Warrington Road and Rushgreen Road/Tanyards Farm, the site at Cherry Lane provides alternative choice of routes through Lymm which will not create significantly more additional trips through the centre of the town, adding to traffic congestion and pollution.
- 21.9 It is expected that, due to the strategic location of Cherry Lane to the south of the village, nearest the motorway network, it will have the lowest traffic impact on Lymm town centre for the majority of trips compared to the proposed allocations.
- 21.10 The site is the closest site to the proposed new employment area as part of the Garden Suburb and also has easy access to both Manchester and Liverpool via the motorway network. This is in contrast to the traffic from the proposed allocations which will have to pass through the centre of Lymm and past the Cherry Lane site to access the motorways.
- 21.11 The site at Cherry Lane is the only proposal that could accommodate the need for playing fields for Cherry Tree Primary School in close proximity. The proposal of a community area within the development can include a serviced site for a new medical practice, should the allocation at Rushgreen/Tanyards Farm be deleted in favour of Cherry Lane.
- 21.12 The site at Cherry Lane is effective and can be delivered without any up-front infrastructure improvements.
- 21.13 The evidence provided by Wallace in its General Representations and in this representation, has demonstrated that there is a potential under delivery of completions from effective sites at the beginning of the Plan period. Wallace has shown that the site at

Cherry Lane can come forward in the initial years 0-5, making an immediate contribution to the Local Plan’s rolling 5-year effective housing land supply.

- 21.14 Wallace requests that the site is allocated on its sustainability merits to help meet the Council’s development strategy in its outlying settlements, addressing any shortfall in the housing requirements for Lymm which may arise for the allocated sites for the issues explained above.

22. RECOMMENDATION FOR MODIFICATION TO DRAFT LOCAL PLAN

- 22.1 Depending on the overall scale of growth to be accommodated in Lymm, Wallace recommends that Cherry Lane is allocated for 200 homes, informal and formal public open space with locally equipped area of play, and the provision of serviced land for community use such as a new GP Surgery (if required) or playing fields for Cherry Tree Primary School.
- 22.2 This proposed allocation can be either a sustainable addition to the housing land supply in the early part of the plan period if the scale of growth for Lymm is increased as proposed by Wallace to 740 homes, or as a sustainable replacement for the draft allocations in Lymm which in Wallace’s opinion should be removed or reduced in scale (with the exception of the part of Rushgreen Road/Tanyards Farm for 64 homes that was granted permission on Appeal) to deliver the Council’s proposed minimum of 430 homes in Lymm.

This document was prepared by Icenii Projects on behalf of Wallace Land Investments

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