

Nigel & Sarah Crompton



14 November 2021

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

Our Ref: Land on the N.E. side of Bell Lane (nr 18 & South of Beech House), Thelwall

Dear Sirs

**RE: WARRINGTON LOCAL PLAN 2021 – CONSULTATION ‘REPRESENTATION’  
MODIFICATION TO THE LOCAL PLAN**

We visited the recent public consultation event held in connection with the above at the Halliwell Jones Stadium in Warrington and spoke to a Policy Officer during the event. We note the key changes from the 2017 and 2019 versions of the Local Plan which are summarised in six points within the WBC website.

Within the 2021 proposal is the reduction of the ‘Garden Suburb’ concept in South Warrington, (both within and beyond the 15 year plan period, albeit 2400 houses would still be expected before 2037), alongside the 6% reduction in the quantity of land removed from Green Belt to service housing development, down from 11% to 5%. Like many we welcome the reduction to the proposed release of Greenbelt and are not in favour of unnecessary release if target assessments can be achieved by other means. The consequences and impact of the release of Greenbelt inappropriately are irreversible. We therefore welcome the inclusion of Fiddler’s Ferry Power Station site (to be demolished) on the western border and the use of all brownfield, piecemeal and incongruous land parcels, to facilitate the contribution to meeting anticipated housing and employment targets, both within the 18 year plan period and beyond.

**Thelwall Heys**

The inclusion of the proposal for at least 300 homes on the Greenbelt Thelwall Heys (Policy MD5) site (which was previously not included in either the 2017 or 2019 versions of the plan) is however concerning, given that it was the subject of an inquiry in 2004, which rejected its use for housing development at the time. We are trusting that the independent inspector’s review of the latest draft plan will address any changes to Greenbelt assessment criteria (set out in Arup’s 2016 Assessment document) which now appear to justify this site’s inclusion within the Warrington plan. WBC’s assessment of its ‘Level of Contribution’ as a ‘Weak

Contribution' to the Green Belt is arbitrary and inconsistent with this site's planning history. This appears to have emerged in 2021 as an academic exercise to 'make the glove fit the hand' to facilitate target delivery. We believe this is **unjustified** and fails the 'Soundness' test set out in paragraph 35 of the National Policy Framework (NPPF). The 5 purposes of the Green Belt set out in WBC/ARUP final 2016 report (page 12 and 13) are clear and nothing has changed over the past 17 years, since its initial rejection by the inquiry, to now warrant a variation to the assessment criteria and how this site is any more suitable for housing than previously.

### Local Plan since 2014

We are aware that the genealogy of the latest 2021 Local Plan Core Strategy proposals can be traced back to February 2015, when elements of WBC housing policies adopted in July 2014 Local Plan were removed. As a result of the High Court legal challenge, the court ruled against the Council on three of the nine issues relating to housing policies. In those seven years and through three further Local Plan drafts the contextual dynamics have shifted somewhat and we acknowledge the demand for housing has always remained above supply and that demand must be met. The target assessment of numbers however, to be delivered per year by WBC has varied over that time from the original figure of 500 per year (contained within the 2014 plan), to 945 per year (over 20 years) back down to 816 per year (over 18 years) within the latest plan, which proposes a 14% reduction in housing requirement over the previous plan.

We note the latest plan includes for minimum figures and timescales only (15 years from the anticipated date of adoption), which reduces the flexibility should demand challenge future delivery capacity. We do note and acknowledge that Warrington have allowed for a 13% flexibility in land supply, should allocated sites not be able to come forward or are delayed. Given that Warrington Council is tied somewhat to the government's 2014 housing projections methodology (which is in effect forcing WBC to release Greenbelt land to meet the 816 houses per year target) there has been a wide variance over that time in the projected housing numbers required, yet the baseline 2014 housing projections methodology has remained a constant. The accuracy of the actual projections given the historical inconsistencies is concerning. The 'Soundness' of these quantities is questionable and the methodology in reaching these figures, results in a wide variance. There should be greater embedded flexibility that allows for viable sites that are available now to be allocated towards the plan period land supply.

### South East Warrington and Lymm

In addition to the Thelwall Heys (MD5) site we note the sites below that contribute to the proposed south east Warrington Urban Extension:

- **The Hollins Green site (Policy OS3) (90 homes);** WBC assessment of **Moderate** contribution to the Green Belt
- **Lymm Pool Lane/Warrington Road (Policy OS4) (170 homes);** WBC assessment of **Moderate/Weak** contribution to the Green Belt
- **Lymm Rushgreen Road (Policy OS5) (136 homes);** WBC assessment of **Moderate** contribution to the Green Belt

The justification for the selection of these sites are clearly set out within the 2021 plan proposals. If Green Belt release is a 'Fait Accompli' within Warrington, as a result of central government methodology selection, then we would expect a consistency (which embeds

confidence) over both housing target assessment criteria and the Greenbelt Assessment Criteria prepared by Arup's for WBC in 2016 and the Green Belt Assessment – Garden Suburbs options – April 2021). The Local Plan documents are lengthy and there are many, which make it impossible to process and assess within the given consultation period. I would therefore like to draw to the attention of the independent inspector what we believe are inconsistencies and the over application of subjectivity in the method of assessment in relation to the south east urban extension Green Belt. The above sites are tested against the five purposes of Green Belt and four out of the three sites by WBC's own assessments have at least a moderate contribution. If WBC's plan is to release sites with such a value which satisfies the stated policy criteria, then there should be a consistency applied to other sites brought forward during the 2016 'call for sites' process. We believe the assessment criteria is too often subjective and therefore inconsistent. We therefore believe these sites fail the tests of 'Soundness' set out in paragraph 35 of the NPPF. They are **unsound, unjustified and inconsistent**.

### **Summary**

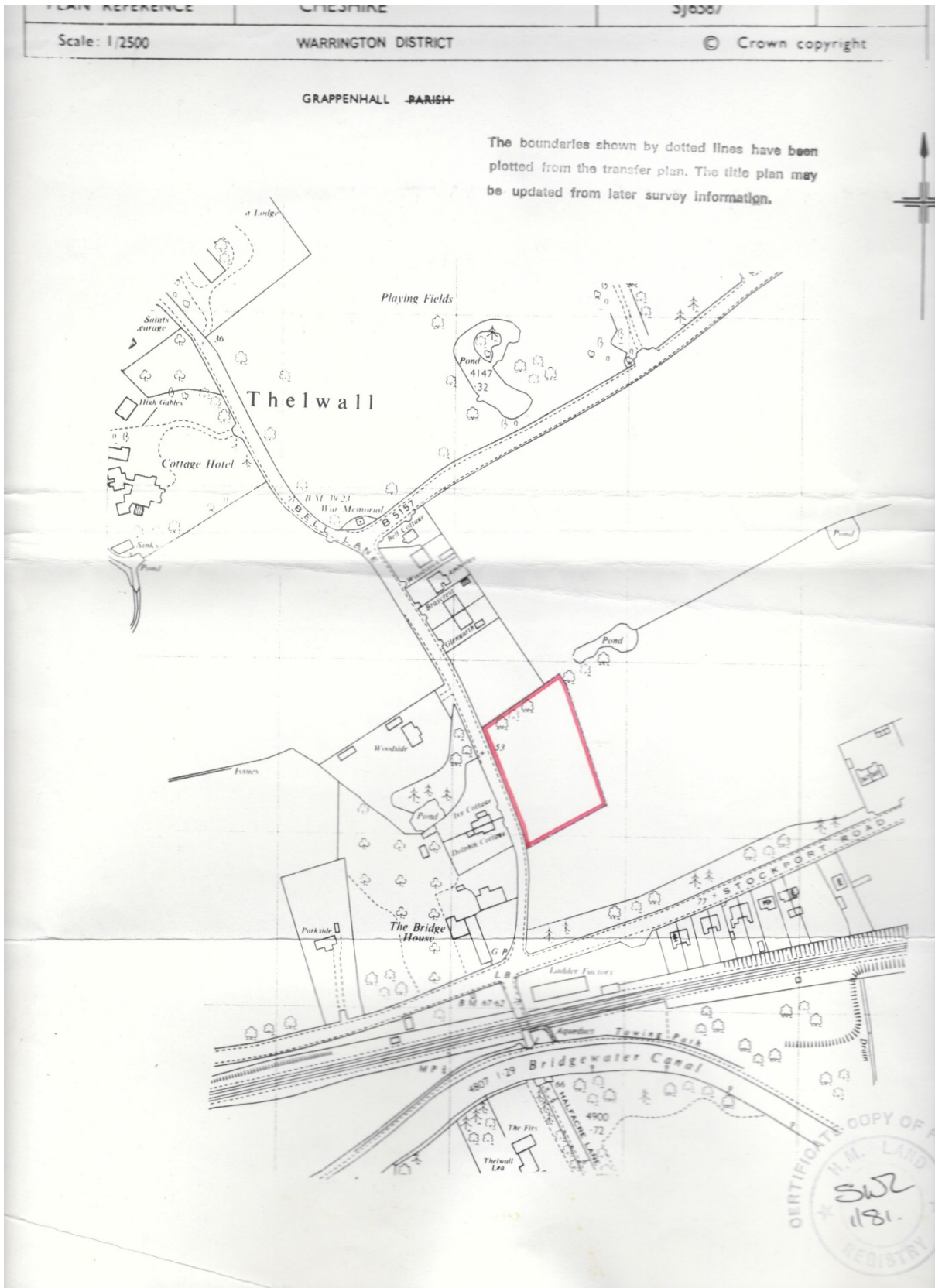
We take this opportunity to remind you of one such site that was presented to you in 2016 during the 'call for sites' process. The original application is included as a supplement to this letter and as a second attachment. This site sits on the east side of Bell Lane, Thelwall on the western edge (see Appendix D/of 2016 Final Report) of area 9. It's contribution to the Greenbelt is assessed as weak/moderate when assessing it against the 5 purposes set out in E1 General Area Assessment Table. Given its position on Bell Lane and its location on the extreme western edge of Green Belt, we believe this site has been overlooked and in doing so the Green Belt contribution assessment methods are **inconsistent & unjustified** and therefore fail the 'Soundness' test set out in paragraph 35 of the National Policy Framework (NPPF).

Should in principle the 2021 Local Plan for the South East Urban extension be approved and found to be sound in its current form and the proposed Greenbelt is released, we would request that you re-consider this site on the N.E. side of Bell Lane (nr 18 & South of Beech House), Thelwall, which also borders onto Stockport Road to the south. This would be a 'modification' to the Local Plan. We believe the impact of the release of this 1¾ acre site is minimal when compared against the assessment criteria and methodology applied to the other nearby sites within south east Warrington. The use of this site would provide greater embedded flexibility and confidence in the delivery of the Local Plan, that allows for viable sites that are **available now**, like this one, to be allocated towards the 18 year plan period land supply (Sarah Crompton is the lead contact on the land title deeds).

Yours faithfully

Nigel & Sarah Crompton

Appendix A – O.S. Plan NTS



## Appendix B – Aerial Photograph NTS

