

Our Ref: 04C100949/ES/RW

Your Ref:

12th November 2021

Warrington Borough Council
Planning Policy and Programme
New Town House
Buttermarket Street
Warrington
Cheshire
WA1 2NH

Dear Sir/ Madam,

Representations to the Local Plan review Proposed Submission Version 2021: Land at Thelwall Heys, Grappenhall (Draft Policy MD5)

These representations have been prepared by Avison Young ('AY') on behalf of Liberty Properties ('Liberty') and refer to land controlled by Liberty at Thelwall Heys, Grappenhall ('the site'). AY have been working on behalf of Liberty since 2017 to promote the site for Green Belt release and a residential allocation within the emerging Warrington Local Plan ('WLP'). During this period, various evidence documents, including a Development Statement have been submitted to Warrington Borough Council (WBC) to justify the release of the site from the Green Belt. The site was previously earmarked as safeguarded land in earlier draft versions of the WLP, but now has a draft allocation for residential development in the Proposed Submission Version Local Plan ('WLPSV21'). Policy DEV1 allocates Thelwall Heys for a minimum of 310 homes and Policy MD5 sets out the site-specific requirements for the development of the site.

Avison Young is highly supportive of the WLPSV21 and in particular of the proposals to allocate the Thelwall Heys site for residential development. These representations set out AY's views on the draft policies of the WLPSV21, and in particular Policies DEV1 and MD5. They provide evidence of the suitability of the site to accommodate sustainable residential development in line with the strategic objectives of the WLPSV21. These representations are supported by a short commentary piece which has been prepared by Hatch on the soundness of the residential allocation strategy set out within the WLPSV21. This commentary is enclosed in full at **Appendix 1** and is referred to throughout these representations. Secondly an Illustrative Masterplan for the site prepared by Planit-ie (**Appendix 2**) is enclosed to demonstrate how the site-specific requirements set out within draft Policy MD5 can be met.

WLP Residential Strategy

The WLPSV21 represents a move away from heavy reliance on large sites for the delivery of housing during the Plan period. Previous iterations of the WLP allocated a small number of sites for major mixed-use development, however these sites did not have existing infrastructure or the funding mechanisms in place to support any meaningful housing delivery in the short term. AY's

previous representations to the WLP argued that a larger number of smaller sites which were available and deliverable now without significant infrastructure investment were required to bolster housing delivery in the short term and that the WLP should therefore identify and allocate sites such as Thelwall Heys for residential development. Along with larger sites such as the South East Urban Extension which will deliver 2,400 homes within the plan period, this would create a better balance which would ensure the Council does not fall short of its annual targets, whilst at the same time securing the Boroughs long term housing supply. Liberty is supportive of the new approach to housing delivery as set out within Policy DEV1 of the WLPSV21. Policy DEV1 identifies a number of smaller sustainable sites such as Thelwall Heys which are capable of delivering modest levels of development within the first 5 years of the Plan period. This is a sound approach as these sites require little to no initial investment before they can begin delivering housing on site.

As noted in the letter prepared by Hatch at **Appendix 1**, the latest Housing Needs Assessment for Warrington (August 2021) shows that delivery rates in the last 5 years have dropped off against the Councils targets, noting on page 41 that *'the Borough has substantially under delivered on (past) housing requirements'*. This is now causing some harm to the Borough and its ability to maintain a healthy short term housing land supply. The amendments made to the WLP which introduce a sharper focus on enabling more short-term housing delivery are sound and are supported by Liberty.

The Local Plan's delivery trajectory figures illustrate that it is a challenge to deliver sites and homes in the early years of the Plan period. Liberty are committing to deliver this site very early as it is a site without any infrastructure constraints and with a strong market demand; it therefore makes an important contribution to the Local Plan in meeting the need for this early delivery.

It is also noted that the policies which will deliver residential development such as Policy MD5 refer to 'minimums' when referring to site capacity and delivery expectations. This approach is the correct one given the evidence of recent under delivery and all housing numbers referred to in the Plan should be very much treated as minimums. The inconsistency between Policies DEV1 which allocates the site for a minimum of 310 homes and MD5 which allocates the site for a minimum of 300 homes should be noted and rectified prior to the Local Plan Examination.

Policy MD5 – Thelwall Heys

The Thelwall Heys site represents a highly sustainable solution to the districts housing needs. The sites proposed release from the Green Belt is very much welcomed by Liberty and is logical given that it scored low in the 2016 Green Belt Assessment. The 2016 Assessment, undertaken by independent experts, commented that the site made a 'weak' contribution towards the Green Belt as there are durable boundaries between the site and the built-up area and therefore its development alongside other adjacent areas of land could be seen as a logical 'rounding off' the settlement pattern. Indeed, this logic would suggest that this site should be considered for removal from the Green Belt and developed before other, better performing sites are considered.

The site is located adjacent to the villages of Grappenhall and Thelwall which offer a range of amenities that can be accessed via existing pedestrian footways located along All Saints Drive, Knutsford Road and Bellhouse Lane. Within 800 metres of the site is a Springbrook Restaurant (560 metres), Tesco convenience store (650 metres), The Bellhouse Public House (650 metres),

Bradshaw Primary School (750 metres), Alphega Pharmacy (760 metres), Grappenhall Post Office (800 metres), Thelwall Community Infant School (800 metres), in addition to two hair salons and four restaurants and cafés. Within 2km of the site there is co-operative convenience store, two doctor surgeries, four schools, three churches and four public houses and various local businesses. It is therefore part of the sustainable 20-minute Neighbourhood concept.

The site is subject to single land ownership with which Liberty has a Promotional Agreement in place. Therefore, the site is within the control of a highly experienced land promoter who would seek to secure planning permission within the shortest possible timescales, delivering much needed new homes early in the Plan Period. The WLPSV21 recognises the site's availability, stating that development is expected to come forwards quickly on the adoption of the Plan, and is expected to be completed in full within the first 10 years of the Plan period.

Detailed technical assessments were undertaken on the site as part of the preparation of a Development Statement which was submitted to WBC in September 2017 as part of Liberty's promotion of the site through the WLP. These technical assessments conclude that there are no physical limitations which would prevent or delay the site from coming forwards for residential development in the short term.

The commentary below demonstrates how the site will be able to meet the policy objectives and requirements as set out by draft Policy MD5:

Quantum of Development and Land Uses

Policy MD5 requires the delivery of a minimum of 300 homes on the site within the first 10 years of the Plan period. The Illustrative Masterplan at Appendix 2 has been prepared to demonstrate how the site could meet this development requirement. The Masterplan shows 310 dwellings laid out at an appropriate density, responding to the stated minimum density of 30dph. These dwellings will be delivered in accordance with housing mix and affordability requirements set out within the WLPSV21.

Policy MD5 also requires open space provisions in accordance with Policy DC5. The enclosed Masterplan illustrates that this requirement would be met through the provision of approximately 6 hectares of enhanced landscape/ open space. Liberty will also meet all requirements set out in Policy MD5 including the preservation of the historic and natural environment. The Masterplan illustrates how the Grade II listed Thelwall Heys (list entry number:1380268) has been protected with the inclusion of surrounding landscape features to act as a buffer between the listed building and surrounding residential development.

The policy notes the importance of ensuring that the southern and eastern boundaries of the site will clearly define the new Green Belt boundary. This will require a landscape scheme that retains and enhances the trees and hedgerows along these Green Belt boundaries. Whilst the Bridgewater Canal provides a strong defensible boundary to the south, these buffers will be strengthened and any future application at the site would be supported by a detailed Landscape Assessment and Scheme which considers these site-specific requirements.

Suitable and Sustainable Access

As recognised within the WLPSV21, the site is located on the existing highway network and is well served by the existing walking, cycling and public transport network. In accordance with Policy MD5 the site will provide a package of sustainable transport improvements including the provision of walking and cycling routes within the site and ensuring good accessibility to public transport services. The Trans-Pennine Trail that runs adjacent to the site will provide a direct and safe off-road cycle and walking route into Warrington Town Centre.

There is no pedestrian access through the site at the moment. However, as part of the development of this site, opportunities to create a network of safe pedestrian routes for local people to enjoy will be provided, in particular running from north to south and east to south providing connections from both Knutsford Road and Stockport Road on to the canal towpath. Therefore it is proposed to enhance the sites connectivity both internally and to wider areas through its positive development.

As shown on the Illustrative Masterplan, two primary access points are shown off the A50 Knutsford Road. The Masterplan has been prepared with input from Croft Eddisons who conclude that safe and secure access can be achieved from the existing highway network.

With bus stops to the south and west of the site along Weaste Lane and Knutsford Road which provide regular services to Warrington and beyond, sustainable access into the site can be achieved by providing safe access to bus stops from the site. In response to the requirement set out by draft Policy MD5, the development will prioritise sustainable movements making the site highly accessible pedestrians through safe and attractive footpath links.

Biodiversity Benefits

The site is currently intensively farmed and therefore has limited biodiversity value. A scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt will be required in line with Policy MD5. This requirement is highly relevant given that the Environment Act became law with immediate effect during the WLPSV21 consultation period and will require the delivery of 10% biodiversity net gain on new developments. In principle Liberty is willing to work with the LPA on BNG and Green Belt compensatory measures in line with the requirement of this new national legislation. A detailed scheme of measures to meet this target would be provided as part of any future planning application. The landscape framework for the site itself will contribute positively to enhancing its biodiversity.

Sense of Place and Residential Design

The site overlooks the Bridgewater Canal in a very attractive part of South Warrington. Liberty Properties is a very experienced developer who is keen to work positively with the Council to ensure that the development of this site is an exemplar in terms of design, facilities and practical sustainable development principles – to create a strong sense of place with the best in residential design and is distinctive to Warrington at this important gateway into the Town.

Contributions to Infrastructure Improvements

As required by Policy MD5, the development of the site will generate financial investment towards cycle links, new school places, primary care facilities and the expansion or enhancement of existing or planned built leisure facilities and playing pitch provision.

Summary

In summary, Liberty are highly supportive of the residential strategy set out within the WLPSV21 and the proposals to allocate the site for residential development. The residential strategy as set out in within the Plan is sound and will ensure that there are sufficient sites to meet the Boroughs short term housing targets, whilst also securing its future long-term supply. Liberty request that the following considerations are made ahead of the Local Plan EiP:

- 1) The inconsistency between Policies DEV1 and MD5 should be addressed in terms of the yield of the site to remove any ambiguity regarding its delivery capability; and
- 2) All housing numbers in the WLP should be treated as minimums. WBC should be able to evidence that each site allocated for residential development is unconstrained and is capable of meeting the minimum yield set out within WLP allocation policies.

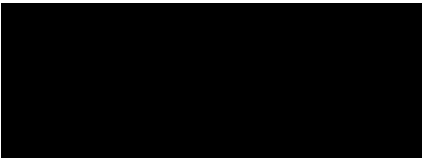
Liberty firmly believes that the Thelwall Heys proposal within the WLPSV21 is soundly based as it is fully justified, effective, consistent with national policy and has been positively prepared for the following reasons:

- The site has scored by independent experts as having a 'WEAK' contribution to Warrington's Green Belt and its development would leave the Green Belt with strong defensible boundaries and can be seen as 'rounding-off' of the settlement pattern;
- The site is within the control of a single land owner and is available to be brought forwards for development now, thereby contributing to the Local Plans early housing delivery trajectory;
- Technical studies have concluded that there are no physical constraints which would prevent or delay the delivery of at least 300 homes within the first 10 year of the Plan period;
- The site is situated in a highly sustainable location with access to existing local and wider services and facilities, particularly to the Town Centre by bike and on foot;
- The development will enhance its internal and external connectivity for local people to enjoy and to enhance its biodiversity and landscape quality;
- The site is able to meet the delivery aspiration of draft Policy MD5. This has been evidenced by the enclosed Illustrative Masterplan; and
- Liberty are committed to providing a development with the highest design standards and a strong sense of place.

I would be most grateful if you could confirm safe receipt of these representations. Liberty are committed to working collaboratively with the Council to achieve the objectives of Policies DEV1 and MD5 and to deliver a development of exemplar quality on the site. I look forward

to hearing from you, however in the meantime should you require any further information then please do not hesitate to contact me.

Yours faithfully,



Emma Sandham



Enc:

Appendix 1: Commentary prepared by Hatch

Appendix 2: Thelwall Heys Illustrative Masterplan

[REDACTED]

Date: 9 November 2021

[REDACTED]

Emma Sandham

[REDACTED]

Advice on Warrington Local Plan Representations : Residential Land at Thelwall Heys

Dear Emma

I have been instructed by Liberty Properties to comment on the residential land policies in the Updated Proposed Submission Version Local Plan 2021 (the “Plan”). The proposed policies that my comments relate to are:

- Objective W1 (delivering a minimum of 14,688 new homes - equating to 816 per year - between 2021 and 2038).
- Policy DEV1 (which amongst other things allocates land at Thelwall Heys for a minimum of 310 homes to be delivered in the plan period).
- Policy MD5 (which reiterates Policy DEV4 and and allocates land at Thelwall Heys for residential development for a minimum of 300 homes¹).

Liberty Properties has control over the site at Thelwall Heys.

Overall Level of Housing Need

Both Objective W1 and Policy DEV4 in the Updated Proposed Submission Version Local Plan 2021 are very clear that the need for 816 residential units per year between 2021 and 2038 is a minimum level of need.

The Plan states “*The Council is planning for a level of homes to meet the Government’s minimum requirement*” (p24)

I would like to reinforce the fact that this number should be very much viewed as a minimum requirement. It is based on the government’s standard method for quantifying housing need and guidance is clear that:

¹ It is unclear why MD5 refers to 300 units minimum, and DEV4 310 units minimum. The Thelwall Heys site is capable of delivering 310 units minimum.

“The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area” Planning Practice Guidance Para 010 Reference ID: 2a-010-20201216.

At no point in PPG is it recommended there be any reduction in the housing requirement below that which is estimated via the standard method. Any adjustments are upward adjustments. The Plan, as it moves through its examination process, should continue to be based on the delivery of at least 816 dwellings per annum.

I note that delivery of the 816 dwellings per annum (dpa) is stepped – increasing from 678 dpa in the first 5 years of the plan period to 870 dpa in years 6-18.

It should be noted that this strategy of stepping up delivery appears to be based on site availability rather than reduced need in the earlier years of the plan period. This runs counter to guidance : *“...housing need is an unconstrained assessment of the number of homes needed in an area”* PPG Para 001 Reference ID: 2a-001-20190220.

I would like to point out that various market signals (see commentary below) indicate the immediate need for enhanced housing delivery and the Plan should continue to favour residential sites capable of early delivery. The Council’s proposed programme of stepped delivery should not be taken as a sign of reduced need in the early years of the plan period.

Importance of Early Delivery

The housing strategy of the Plan is rightly focused on increasing housing delivery as a tool to help Warrington retain both talented individuals and sustain social bonds within communities:

“Increasing housing delivery will support the Council’s aim of promoting social inclusion. It will ensure people have genuine choice over the location in which they live and enable households to remain within their local communities over time” (p37)

The Council’s recent Housing Needs Assessment (2021) confirms the need to catch up on relatively low rates of housing delivery in recent years:

“Over the period since the 2010/11 Census, housing completions have averaged 562dpa. Over the five-year period since 2016/17 the average has slowed to 487dpa” (p7).

“the borough has substantially under-delivered on (past) housing requirements” (p41)

There is an immediate need for Warrington to get on a more healthy trajectory of housing delivery and to ensure the overriding Plan aim of ensuring households can remain in communities is delivered.

Data on both average house price increases and increases in the affordability ratio are worrying and point to the need for a rapid increase in housing delivery. Average house price increases in Warrington over the last 10 years (+30%) are greater than the North West average (+28%). More significantly the increase in the affordability ratio (+10.7%) is double the increase witnessed across the region as a whole (+5.1%) – see Table 1.1.

Table 1.1 : Change in Market Signals Indicators

	Median House Prices (£)		
	2010	2020	Change
Warrington	150,000	195,000	+30%
North West	132,000	170,000	+28%
	Ratio of median house price to median gross annual workplace-based earnings		
	2010	2020	Change
Warrington	5.66	6.27	+10.7%
North West	5.47	5.75	+3.6%

Source : Office for National Statistics (ONS)

Delivery Credentials of Site at Thelwall Heys

My understanding is that Liberty would seek to deliver a well-integrated, high quality residential development which meets the needs of the local community at Thelwall Heys. It represents a logical and natural extension to Grappenhall, and is accessible, with easy access to key existing and future services and facilities.

Policy MD5 of the Updated Proposed Submission Version Local Plan 2021 states that:

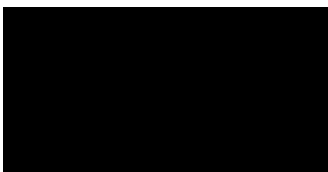
“Development is expected to come forward quickly on the adoption of the plan. This means the first new homes are anticipated to be completed in 2024/25, with the development completed in full within the first 10 years of the plan” (para 10.5.3)

It appears that there are no delivery obstacles preventing the site from early completion. The site is under one land ownership and no land assembly is required. It is physically unconstrained and will not require the implementation of any significant new infrastructure to facilitate its delivery.

I trust this letter is helpful. It shows that:

- The need for 816 residential units per year between 2021 and 2038 is a minimum level of need. Any future adjustments to this figure, should they be necessary, must be upward adjustments.
- Various market signals indicate the immediate need for enhanced housing delivery and the Plan is right to favour residential sites capable of early delivery
- The Liberty controlled site at Thelwall Heys is an excellent housing site that can deliver much needed housing early in the plan period.

Yours sincerely



Darren Wisner,





PROJECT

**THELWALL HEYS,
GRAPPENHALL**

DOCUMENT

UPDATED SKETCH MASTERPLAN

CLIENT
LIBERTY PROPERTIES

STATUS
DRAFT

DATE
08/10/21



Illustrative Masterplan



Landscape Strategy

