

# Proposed Submission Version Local Plan

## PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

**Name of person completing the form:** joanne mcgrath

**Email address:** [REDACTED]

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	Mulbury Homes (Grappenhall) Ltd
<b>Agent name (if applicable)</b>	-
<b>Address 1</b>	-
<b>Address 2</b>	-
<b>Postal Town</b>	-
<b>Postcode</b>	-
<b>Telephone number</b>	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

MD2 South East Warrington Urban Extension

2. What does your comment relate to? Please select one option.

None of the above

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
<b>Legally Compliant</b>		X
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>		X

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Carr House Farm Final 15.11.21 with appen.pdf - [REDACTED]

You have just completed a Representation Form for MD2 South East Warrington Urban Extension.

Please select what you would you like to do now?

Submit response ( I am a Developer / Landowner / Group / Organisation)



# Representations - Warrington Local Plan 2021 Updated Proposed Submission Version

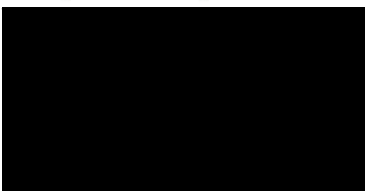
*on behalf of:*

**Mulbury Homes (Grappenhall) Ltd**

**Land at Carr House Farm, Broad Lane,  
Grappenhall**

**November 2021**

*Prepared by*



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## 1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Mulbury Homes (Grappenhall) Ltd in response to the Warrington Updated Proposed Submission Version Local Plan 2021 and relate specifically to land adjacent to and surrounding Carr House Farm, Broad Lane, Grappenhall, Warrington. From this point forward, referred to as 'The Site'. A Site location plan is included at Appendix 1.
- 1.2 The Site is being promoted on behalf of the landowners by Mulbury Homes (Grappenhall) Ltd. To date the Site has been promoted alongside the emerging Warrington Local Plan for release from the Green Belt to meet future housing requirements.
- 1.3 These representations seek to provide short specific comments in relation to the proposed Green Belt Boundary which defines the Warrington Garden Suburb ("WGS") under 'Policy MD2- Garden Suburb. Commentary is also provided on the imminent obligation for Biodiversity Net Gain (BNG) and the potential merits of part of the Site to facilitate this requirement.
- 1.4 Additional representations have been provided by Pegasus Group on behalf of Land Consortium which include Taylor Wimpey, Bloor Homes, Lone Star Limited and Mulbury Homes (Grappenhall) Limited.



## 2. THE SITE AND SURROUNDING AREA

- 2.1. The Site is located at the southern periphery of Grappenhall, which sits to the south of Warrington town centre. A Site location plan is included in Appendix 1.
- 2.2. The Site is split into two parcels (referred to as the northern parcel and the southern parcel herein). The northern parcel extends to approximately 11.67 hectares (28.8 acres). It is currently comprised of two arable fields, with hedgerows and scattered hedgerow trees along the northern, southern, and western boundaries and to the eastern boundary is a block of woodland. The southern parcel extends to approximately 12.71 hectares (31.41 acres). It is currently comprised of two arable fields, with hedgerows along the boundaries.
- 2.3. Part of the wider Site is also in a commercial use with the sale of Christmas Trees at Carr House farm.
- 2.4. The northern parcel adjoins Grappenhall Hall Residential School to the north. The school buildings are owned by Warrington Borough Council. The school has been closed for several years but has future development potential.



### 3. DEFENSIBLE GREEN BELT BOUNDARY

- 3.1. Paragraph 143 of the National Planning Policy Framework (NPPF) is clear that local authorities should *“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”*.
- 3.2. For the Plan to be found Sound, the proposed WGS allocation must be able to clearly define the new Green Belt boundaries so that they endure in the long term. We would re iterate the comments made in paragraphs 5.18 to 5.20 and 8.24 by the Pegasus Group on behalf of the WGS Land Consortium in relation for the need for the eastern boundary to be strengthened to create a new recognisable and permanent Green Belt.
- 3.3. In addition, having reviewed the Development Options and Site Assessment Technical Report (September 2021) and the Green Belt Site Selection – Implications of Green Belt Release- Arup 2021, the table on Page 8 asks the question as to whether a *‘new GB boundary would be defined using physical features that are readily recognisable and likely to be permanent?’*. The report states that *“the remainder of the eastern boundary consists of sections of field boundaries and the south eastern boundary consists of a field boundary. These would need to be strengthened to create a new recognisable and permanent GB boundary.”*
- 3.4. We do not consider that the justification or explanation provided within this table conforms with Paragraph 145 of the NPPF. It is our view that Broad Lane provides a ‘readily recognisable and permanent feature’ within very close proximity and therefore the need to create a strengthen an *‘artificial’* boundary along sections of fields is illogical.
- 3.5. Indeed, the northern part of Broad Lane is used as a logical boundary until the ownership of the land falls outside of Homes England ownership. We would therefore further argue the proposed Green Belt boundary (across the WGS and not just the eastern boundary which is of significant to our clients land) is heavily and seemingly conveniently influenced by land ownership rather than policy direction intended within the NPPF. In our view this is a fundamental flaw of the Plan as currently drafted and goes to the heart of soundness.

## 4. REQUIREMENT FOR BIODIVERSITY NET GAIN

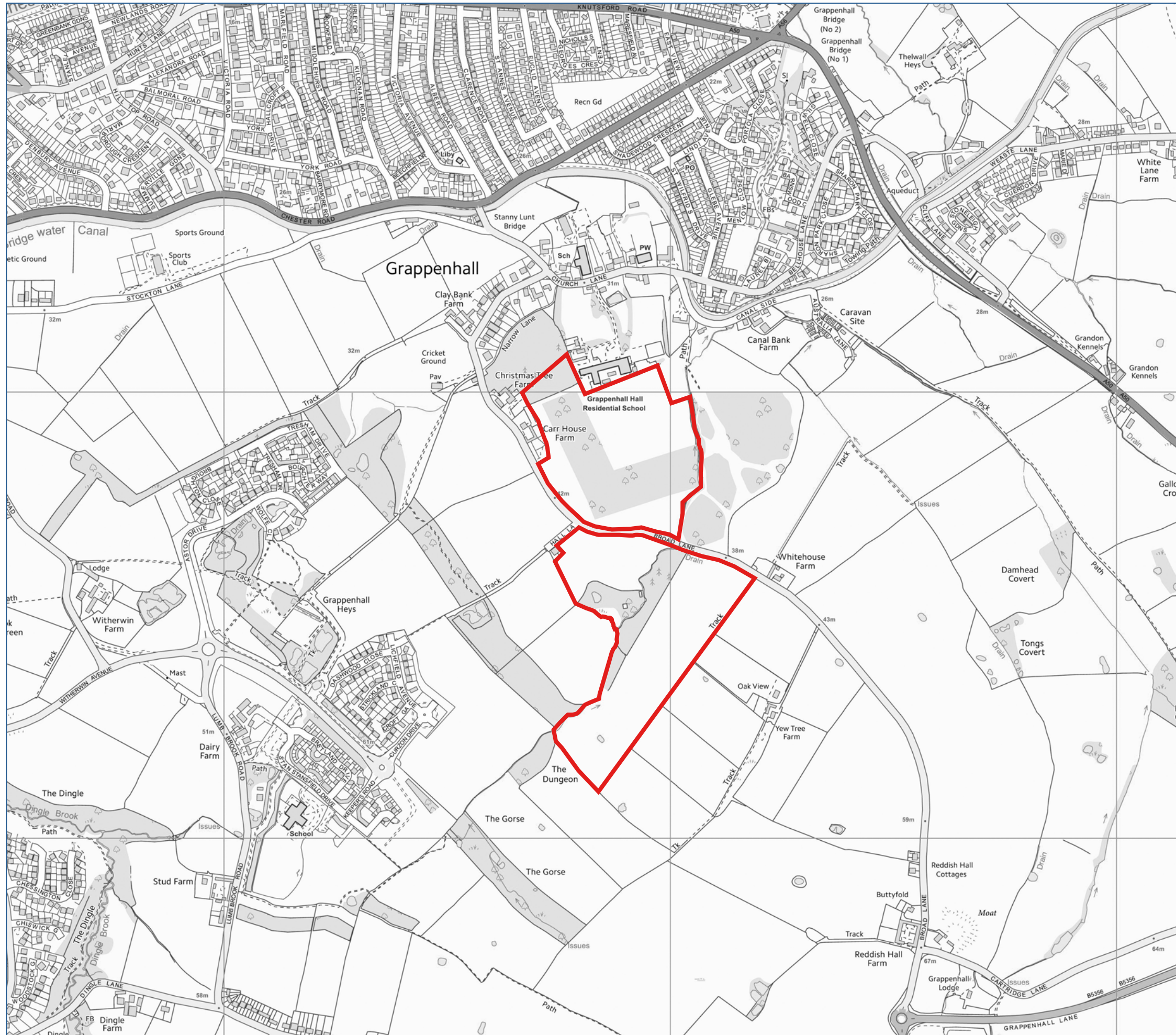
- 4.1. The previous Proposed Submission Version Local Plan (March 2019) included the proposal for a Country Park covering our client's land. The representations made by Pegasus Group on behalf of the Land Consortium include the merits and benefits of such a proposal continuing to be included along with other critical infrastructure within the updated proposed submission version of the plan.
- 4.2. As part of the opportunity to comment on the current version of the Plan, we wish to highlight the imminent obligation for Biodiversity Net Gain (BNG). Whilst at present this is not specifically included or referenced in the plan, as the recent Royal Assent of the Environment Act was only confirmed on 10th November 2021, as matters currently stand it is anticipated that consultation on the detailed regulations governing BNG will be carried out in 2022 with implementation of the BNG obligation from 2023. This is therefore a matter which may become more relevant through the Examination in Public process and options for the ability to deliver BNG across the borough require consideration as this matter will directly impact the quantum of housing that can be delivered from those Sites suggested for Allocation in this version of the Plan.
- 4.3. At present it is not possible to predict with any great accuracy precisely how developers will be required to ensure measurable BNG but it is likely the requirement will be in the region of 10% and BNG delivery could be imposed through a standard condition on all relevant planning permissions.
- 4.4. In the case of our clients Site, the land to the north of Broad Lane was formerly allocated as the Country Park and therefore offers a realistic option to provide a significant area of BNG to 'offset' the development of the parcel of land to the south of Broad Lane for residential purposes. The removal of the southern parcel from the Green Belt would also ensure a defensible boundary is continued along Broad Lane and allow the parcel to the north to remain in the Green Belt as currently proposed within the updated proposed submission version of the plan. See Appendix 2 for our suggested amendments.





## APPENDIX 1 – SITE LOCATION PLAN





 Site Boundary

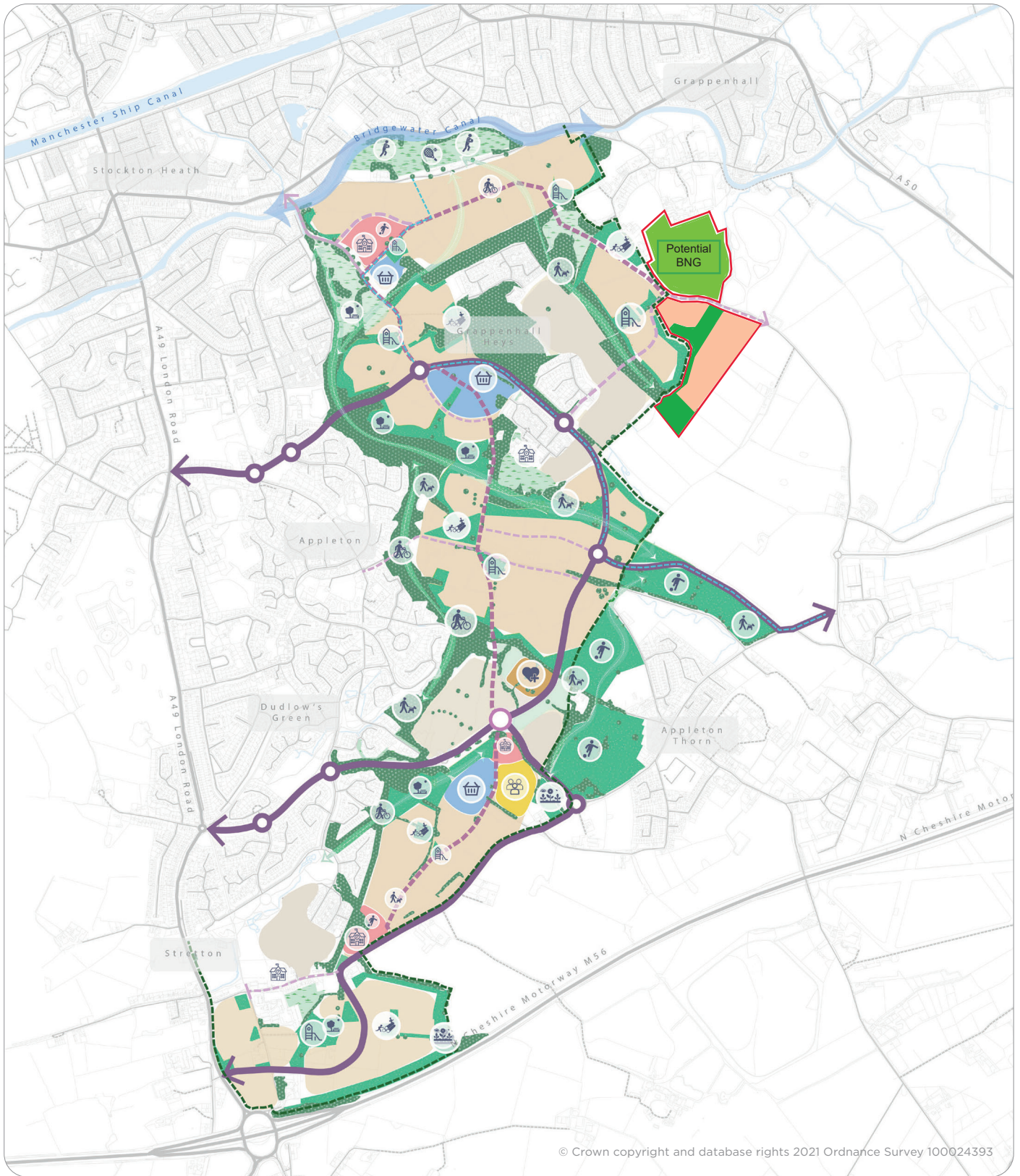


Project Land at Broad Lane, Grappenhall.  
 Drawing Title **Site Location Plan**  
 Scale As Shown (Approximate)  
 Drawing No. 10728/P07  
 Date July 2017  
 Checked DE/AL



## APPENDIX 2 – ALTERNATIVE WGS PROPOSAL





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Figure 3. Indicative Masterplan Framework

- |  |                                    |  |  |
|--|------------------------------------|--|--|
|  | Established Tree Groups            |  | Indicative Strategic Highway Network         |
|  | Existing Open Space                |  | Indicative Mass Transit Safeguarded Corridor |
|  | Indicative Green Infrastructure    |  | Indicative Low Traffic Community Connector   |
|  | Indicative Residential Development |  | Local Links                                  |
|  | Indicative Local Centres           |  | Green Links (to include active travel)       |
|  | Indicative Education               |  | Consented Development Schemes                |
|  | Indicative Healthcare              |  | Existing Connection Along Bridgewater Canal  |
|  | Indicative Community Hub           |  | Revised Green Belt Boundary                  |