

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: Jenny Brow

Email address: [REDACTED]

2. What type of respondent are you? Please select one option only.
If you are an agent please select the type of client you are representing.

A Developer / Landowner

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	Ainscough Strategic Land
Agent name (if applicable)	Jenny Brow
Address 1	[REDACTED]
Address 2	[REDACTED]
Postal Town	[REDACTED]
Postcode	[REDACTED]
Telephone number	[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.

DEV1 Housing Delivery

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
Legally Compliant	X	
Sound	X	
Compliant with the Duty to Co-operate	X	

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: Reg 19 Local Plan Reps.pdf - [REDACTED]

Comments/file description

Ainscough Strategic Land Reg 19 Reps

You have just completed a Representation Form for DEV1 Housing Delivery.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**

12th November 2021

Warrington Borough Council
East Annexe, Town Hall
Sankey Street
Warrington
WA1 1UH

Dear Sirs,

Warrington Local Plan 2021 to 2038 Publication Draft Consultation

Submission by Ainscough Strategic Land (ASL)

Introduction

This response is made by Ainscough Strategic Land (ASL) to the Publication Draft (Regulation 19) consultation. Following the close of this consultation, it is noted that the Council will submit the Local Plan to the Secretary of State for its Examination. ASL is an experienced land promotion company who specialise in the delivery of large-scale residential and mixed-use schemes. We promote and prepare development schemes for a range of sites to feed into the housebuilding and industrial sectors. Those sites are both sustainably located and deliverable so they can be built out quickly and efficiently, contributing much needed new housing and employment opportunities in this country.

Policy DEV1 – Housing Delivery

Policy DEV1 sets the housing requirement to be delivered within Warrington Borough Council over the plan period of 2021 to 2038. This is set as a minimum of 14,688 dwellings, which equates to 816 dwellings per annum (dpa). This requirement is to be brought forward through a stepped trajectory with a requirement of 678dpa between 2021 and 2025 and then increase to 870dpa from 2026 to 2038. ASL agree that this is a sensible approach to allow time for larger allocations to get on site and start delivering.

The 816dpa requirement has been calculated using the Government's standard methodology. The NPPF expresses that this should be the minimum figure that Council's should aim to deliver. ASL support the policy text which states that this is a minimum figure but suggests that to meet the objective of being '*one of the most important economic hubs in the UK*', that higher minimum housing targets would have helped to support this ambition. Adequate housing and infrastructure provision need to be delivered to match this economic growth. Affordability is already an issue within Warrington, as expressed in Paragraph 2.1.12. Economic growth without the housing to meet this growth will only worsen this issue further. Therefore, the economic growth ambitions need to be taken into account when calculating housing needs.

Policy DEV1 also identifies how this housing target will be delivered. This includes two large, strategic sites. One being 4,200 dwellings at South East Warrington of which 2,400 dwellings is expected to be delivered by 2038 and the second being 1,760 dwellings at Fiddler's Ferry of which 1,310 dwellings will be delivered within the plan period. It is well known and not uncommon for strategic sites of this size to take much longer to be delivered than originally anticipated. This is often due to the infrastructure which is needed to deliver schemes of this scale. It is noted and supported that the

Council have allocated 10% over their requirement to allow for flexibility in case some sites don't come forward or aren't delivered as quickly as anticipated. It is also noted that the Council are committed to considering an early review if they are unable to demonstrate a 5 year housing land supply. However, to prevent a possible early review, the Council could consider increasing their flexibility within the plan to prevent such an early review having to take place. The site outlined below is a deliverable and sustainable site, which should be considered if the Council determine they need to increase their flexibility or if an emerging allocation is considered not deliverable throughout the examination process.

Land at Delph Farm, Winwick

ASL are promoting Land at Delph Farm, Winwick as show in Figure 1 below. Delph Farm is located to the south west of Winwick and is bound by Hollins Lane to the north, Hollins Park Hospital and a service station to the east, the M62 to the south and Mill Lane to the west. The site can be safely accessed from Hollins Lane or Delph Lane. Winwick is a sustainable settlement, which includes a convenience store, a primary school, a hospital and a leisure centre but is also in close proximity to Warrington, which boasts all the major services and facilities residents would need. Winwick is allocated 130 dwellings in the Publication Draft version of the Local Plan and therefore, is seen by the Council as a sustainable option for growth.

The allocation in Winwick is to the north of the settlement. The supporting text within the Local Plan states that the allocation has good access to *'Warrington Town Centre, and major existing and proposed employment areas at Winwick Quay, Omega and Gemini.'* Land at Delph Farm is located closer to all of these locations than the emerging allocation and therefore has better access to these locations. It also situated close to junction 9 of the M62 meaning that both Manchester and Liverpool are easily accessible. In addition, due to the size of the site, there is the opportunity to bring forward some community uses on site and deliver a mixed-use scheme. ASL would work closely with the Council and the Community to understand if there are any facilities that Winwick could benefit from that could be delivered on site to provide additional benefits to the area. This could also result in both the existing residents of Winwick as well new residents of the site having to travel out of Winwick less.

The site is currently located within the Green Belt; however, the majority of the Borough is also constrained by Green Belt. The Council already accept that exceptional circumstances exist to release development from the Green Belt for this reason and therefore, are proposing to remove 580 hectares of Green Belt land for development. ASL do not believe that the land at Delph Farm constitutes an important part of the Green Belt and removing the designation would not harm the purpose of the Green Belt. The site is well contained with the M62 to the north and the railway line to the west and would not lead to merging of any neighbouring settlements. Therefore, removing the site from the Green Belt would have minimal harm and would not undermine the purpose of the designation.

Other than the Green Belt designation, the site is unconstrained with no technical reasons that would prevent it being developed. Therefore, it is an available and deliverable site in a sustainable location that the Council should consider if it is found that further sites are needed throughout the examination process or if there are concerns regarding soundness of the plan.

Other Uses

Considering its location, ASL have also considered other uses that would be appropriate on the site at Delph Farm. ASL are aware of the Council's ambition for the Borough to be a key economic driver and this is demonstrated through the amount of employment space the Council is seeking to allocate. Due to the site's location adjacent to junction 9 of the M62, ASL believe this would also be a suitable site for employment use. This location and size would be suitable for B8 use or Offices under Class E; however, ASL are open to discussions with the Council regarding demand and would undertake any necessary work to understand what the employment needs are within the Borough. There are already huge employment spaces within this area, such as Winwick Quay directly to the south, reflecting how accessible this area is and therefore, Delph Farm could logically and sustainably extend and enhance this employment hub further.

In summary, land at Delph Farm is suitable for residential, mixed-use or employment development. The site is in single-ownership, is sustainably located and technically deliverable and should be considered by the Council if it is determined through the examination process that further land is required for any of these uses or if there are concerns around the soundness of the plan.



Figure 1: Land at Delph Farm, Winwick