

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: D Matthewman (County Planning LTD)

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)	County Planning Ltd
Agent name (if applicable)	-
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.

Plan as a whole

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

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

Policies INF2; ENV3; DC1 and TC1

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		

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

See accompanying representation letter and report

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

See accompanying representation letter and report

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Alterations to policies INF2; ENV3 and TC1 as well as a bespoke allocation for the land fronting Wilson Patten Street would help to ensure that the draft plan is positively prepared and ultimately in so being, achieved compliance with national policy embodied in the NPPF. Accordingly, we seek these amendments to the policy wording and inset maps.

See accompanying representation letter and report for detail

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

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

See accompanying representation letter and report for detail

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: BRE680-28 - Local Plan Rep Cover letter (2) 15-11-2021.pdf - [REDACTED]
- File: BRE680-28 - Local Plan Rep Final 15-11-2021.pdf - [REDACTED]

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

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



COUNTY PLANNING LTD

Moving Development Forward

CONSULTATION RESPONSE TO DRAFT WARRINGTON LOCAL PLAN - DRAFT SUBMISSION VERSION (NOVEMBER 2021)

PROPOSAL: RESIDENTIAL-LED DEVELOPMENT OF UPTO 369NO. ONE; TWO AND THREE-BEDROOM APARTMENTS, TOGETHER WITH ASSOCIATED SURFACE INFRASTRUCTURE WORKS, LANDSCAPING AND HIGHWAYS IMPROVEMENTS.

LOCATION: GO OUTDOORS SITE AND SURROUNDING LAND SITUATED SOUTH OF WILSON PATTEN STREET, WARRINGTON, WA1 1PS.

APPLICANT: CHESRO LTD

REFERENCE NOS:

PR2020/04486

OUR REF: BRE680/28

DATE: NOVEMBER 2021

COUNTY PLANNING LTD



www.CountyPlanning.co.uk



RTPI

Chartered Town Planners

Date. 15th November 2021
Our ref. BRE680/28
Your refs. PR2020/04486
Contact. [REDACTED]

CONSULTATION RESPONSE TO DRAFT WARRINGTON LOCAL PLAN DRAFT SUBMISSION VERSION, NOVEMBER 2021

PROPOSAL: RESIDENTIAL-LED DEVELOPMENT OF UPTO 369NO. ONE; TWO AND THREE-BEDROOM APARTMENTS, TOGETHER WITH ASSOCIATED INFRASTRUCTURE WORKS.

LOCATION: GO OUTDOORS SITE AND SURROUNDING LAND SITUATED SOUTH OF WILSON PATTEN STREET, WARRINGTON, WA1 1PS.

1. INTRODUCTION

- 1.1 This document is a consultation response to the draft Warrington Local Plan (Submission Version, November 2021) submitted to Warrington Borough Council on behalf of the freehold landowner and our client, Chesro Ltd. It is additional to Pre-app request ref. PR2020/04486.
- 1.2 This representation puts forward the land current occupied by Go Outdoors and the surrounding land situated south of Wilson Patten Street, Warrington, WA1 1PS for a residential-led development allocation as part of the emerging local plan.
- 1.3 This statement sets out the background to the application site, explains the concept and feasibility information produced by Falconer Chester Hall architects. This statement addresses, in brief, the following matters of principle:
 - o Development area
 - o Constraints
 - o Scale and quantum of development
 - o Materials and indicative layout
 - o Heritage and conservation impacts
 - o Amenity considerations (noise and air quality)
 - o Brownfield Register Part 2 (Permission in Principle)
- 1.4 This representation additionally explains why we consider that amendments to the draft plan are necessary. It promotes the redevelopment of brownfield land and amendments to policies INF2; ENV3; DC1 and TC1 to ensure that the plan is sound by being justified and positively prepared. Without amendments, we submit that the draft plan will not achieve compliance with policies embodied within the National Planning Policy Framework (NPPF).

2. SITE DESCRIPTION

- 2.1 The application site comprises approximately 0.93ha (2.31 acres) of situated land south of Wilson Patten Street, in the town centre of Warrington. The land is presently occupied by the Go Outdoors retail building and a surface level car park. Bold Street bounds it to the east.
- 2.2 To the south of the site is the Arpley Junction railway line and on the opposite side of Wilson Patten Street is a range of predominantly residential and some mixed-use (commercial at ground floor) Georgian influenced three storey traditional brick-built buildings. These buildings form the southern boundary of the Palmyra Square Conservation Area.
- 2.3 Trees on the northern boundary are protected by a Tree Preservation Order; it is thus intended that wherever possible; these shall be retained as part of the scheme.
- 2.4 The Council has identified the site as site ref. 2672 (together with other adjacent and nearby land) on Part 1 of the Brownfield Register owing to its former use in connection with the Arpley junction railway siding and its currently developed status. The significance of this is designation is discussed in more detail below.
- 2.5 The proposals are for the development of up-to 396 one; two and three-bedroom apartments, split across four primary blocks. Four storey Georgian proportions will feature at the Wilson Patten Street frontage, providing duplex, one and two-bedroom apartments. The design approach has the intention of providing a stepped increase in height toward the riverside development proposals as illustrated in the Town Centre Master Plan (see fig. 4 below).

Fig. 1 - Extract from indicative massing drawings ©FCH

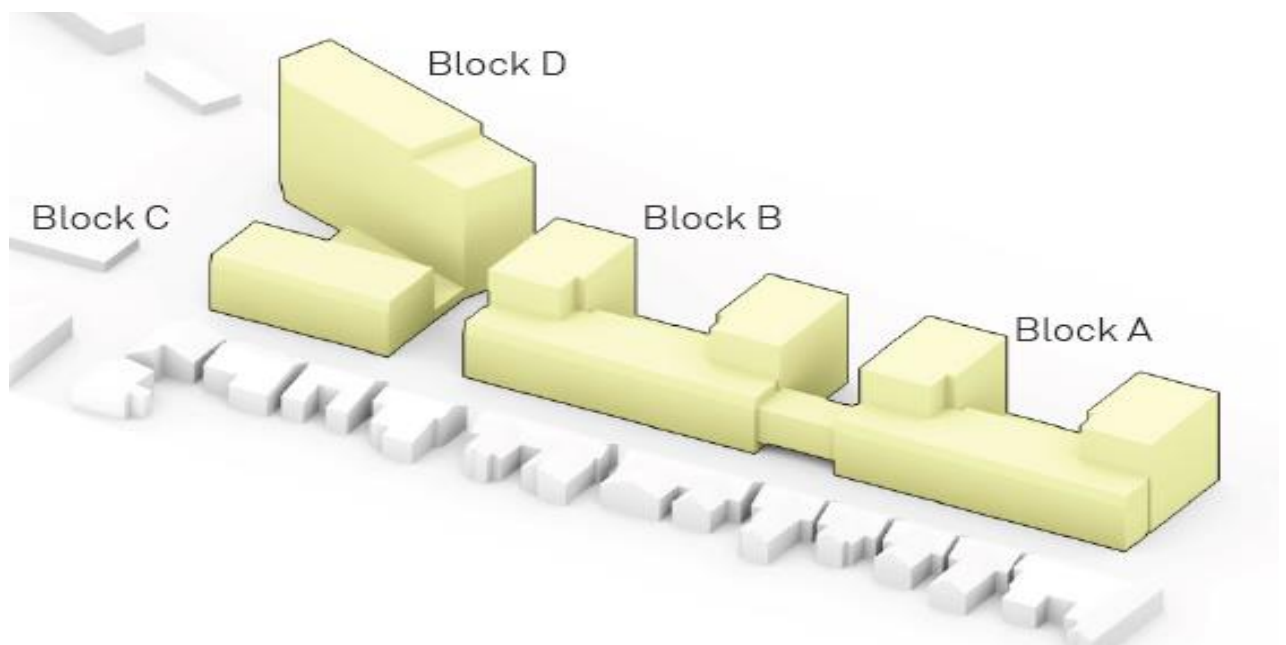


Fig.2 – Illustrated aerial photo of site location ©Google/FCH



© www.CountyPlanning.co.uk

Fig.3 – Extract from Council's Brownfield Register (2018)

Site Reference: 2672 (OSGB36)

Minimum net dwellings: 300 (circa 90 dwellings per hectare)

Size: 3.4ha

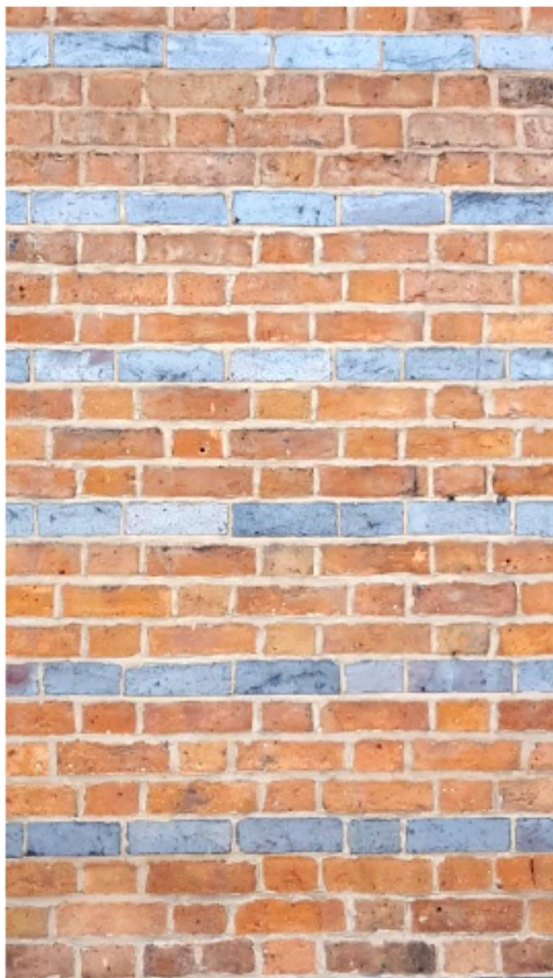


Fig.4 - Illustrated extract showing application site in context of town-centre masterplan ©Warrington & Co.:



3. DESCRIPTION OF PROPOSED DEVELOPMENT

- 3.1 The concept drawings aim to achieve dual aspirations of meeting a commercial necessity to provide a high-density development of circa 360 dwellings per hectare. Owing to the underlease and the town centre location, this scale of development is necessary. Where the development site interacts with traditional 3 storey buildings on Wilson Patten Street, it shall be scaled accordingly in order to provide an appropriate interface between the two sites.
- 3.2 Given the visual and physical separation of proposed Block D from the Conservation Area, there remains the ability to prefer contemporary building materials which mix traditional brick and glass, with an emphasis on height. London boroughs in particular are taking opportunities to progress development schemes that reimagine the use of traditional materials with interesting fenestration to create inclusive and desirable developments with an emphasis on increasing density for city living, by breaking up building mass into blocks.
- 3.3 It is proposed that the Wilson Patten Street facades will be of brick construction with brick detailing to help link its identity to the buildings to the north and within Conservation Area; the simple repetition of the windows and proportions acknowledge their historic neighbours.



Brick banding on 21 Bold Street



Brick cornice detailing 21 Bold Street



Brick cornice detailing 12 Bold Street

The Palmyra conservation area has a distinct identity borne of the materials and pattern of buildings. The buildings, are generally on a grid of streets of uniform width. With terraces of town houses and public buildings such as the Library and the Museum. The conservation area of Warrington is the result of 19th Century Town Planning and its character is reflected in the architecture.

It is proposed that the new building will be of brick construction to echo the identity to this shared materiality of the adjacent Palmyra. There can also be seen in the area intricate brick detailing to the facades of the buildings. It is proposed that some of these details be reused in a contemporary manner. The simplicity of the facade of the Georgian buildings of Palmyra Square, the simple repetition of the windows and proportions are a nod to their historic neighbours.

In summary, the proposal aims to create a contemporary building that echoes the past that firmly root it within the context of the area. The use of those traditional materials and details in a manner which creates a new addition against the historic buildings of Stanley Street at

BOLD STREET, WARRINGTON PRECEDENTS



FCH

Design intelligence, commercial flair.

Fig.6 - Illustrative layout options

BOLD STREET, WARRINGTON TYPICAL UPPER FLOOR PLAN



4. PLANNING POLICY ANALYSIS

4.1 Warrington is a town with a diverse social and economic background, characterised by its relatively recent history as a New Town. Substantial population growth since the late 1960s and its geographic location close to major conurbations of Liverpool and Manchester (together with close proximity to the M62 and M6 motorways) provide both opportunity and challenges for the town in the present day.

4.2 The Council has completed a joint Core Strategy and Local Plan (2014) which sets strategic priorities and development plan policies against which planning applications are assessed. The following section of this statement considers the planning policy context of the development site and the town more widely.

Core Strategy (strategic context)

4.3 The statutory development plan, for the purposes of Section 38 of the 1990 Act (as amended) comprises the Local Plan Core Strategy (adopted July 2014) (hereafter 'LP'). It replaces the Unitary Development Plan (1995) and sets out the spatial strategy and vision for the whole Borough between 2012 and 2027.

4.4 At a site-specific level, the land is not subject to any specific designations within the adopted Core Strategy LP policies map; although it is identified with the 2020 Town Centre Master Plan (TCMP) which is a vision for the centre of Warrington.

4.5 The site is within the urban area (i.e. it is not green belt land) and save for its proximity to a conservation area, there are no other site-specific policies or development constraints which would otherwise control the nature or scale of proposed development at the site.

4.6 Whilst it was intended that the LP would also identify sites for new homes and employment uses across the borough, in February 2015 the housing sections of the policy were quashed and the revised LP has not yet been examined or adopted.

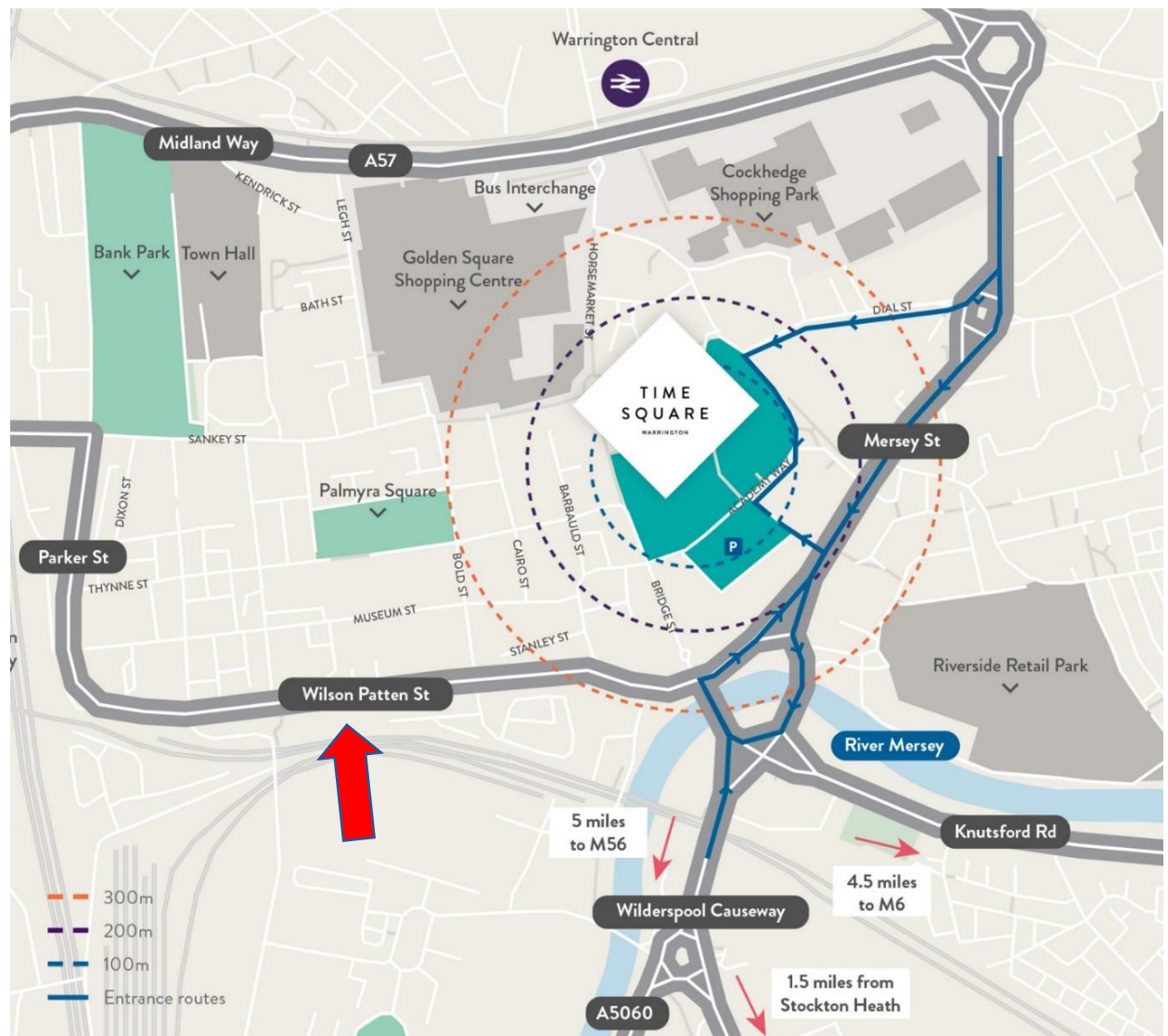
4.7 Officers have already expressed in-principle support for the development of the site for a high-density residential development. The pre-app analysis stated the officer's view that the application site held a key position in the town and therefore a building with an emphasis on height would be acceptable in principle, but scale would need to be carefully considered and justified in order to ensure its design is successful and relates to the wider setting.

4.8 The emerging local plan policies are generally supportive toward town centre living. The regeneration impetus for residential uses and enlivening the town centre economy stem largely from the TCMP. However, it should be noted that the TCMP does not form part of the development plan and therefore carries only very limited weight in decision making.

Town centre redevelopment

- 4.9 The Town Centre Masterplan (2020) and adopted Local Plan identify the Time Square redevelopment as a central focus for retail and leisure redevelopment in the period 2015-2026.
- 4.10 The application site is close by to the time square redevelopment and is perfectly positioned to support the regeneration aspiration. It is located in a sustainable position, adjacent to Bank Quay station and near to Warrington Central train stations, removing the need for private car ownership.

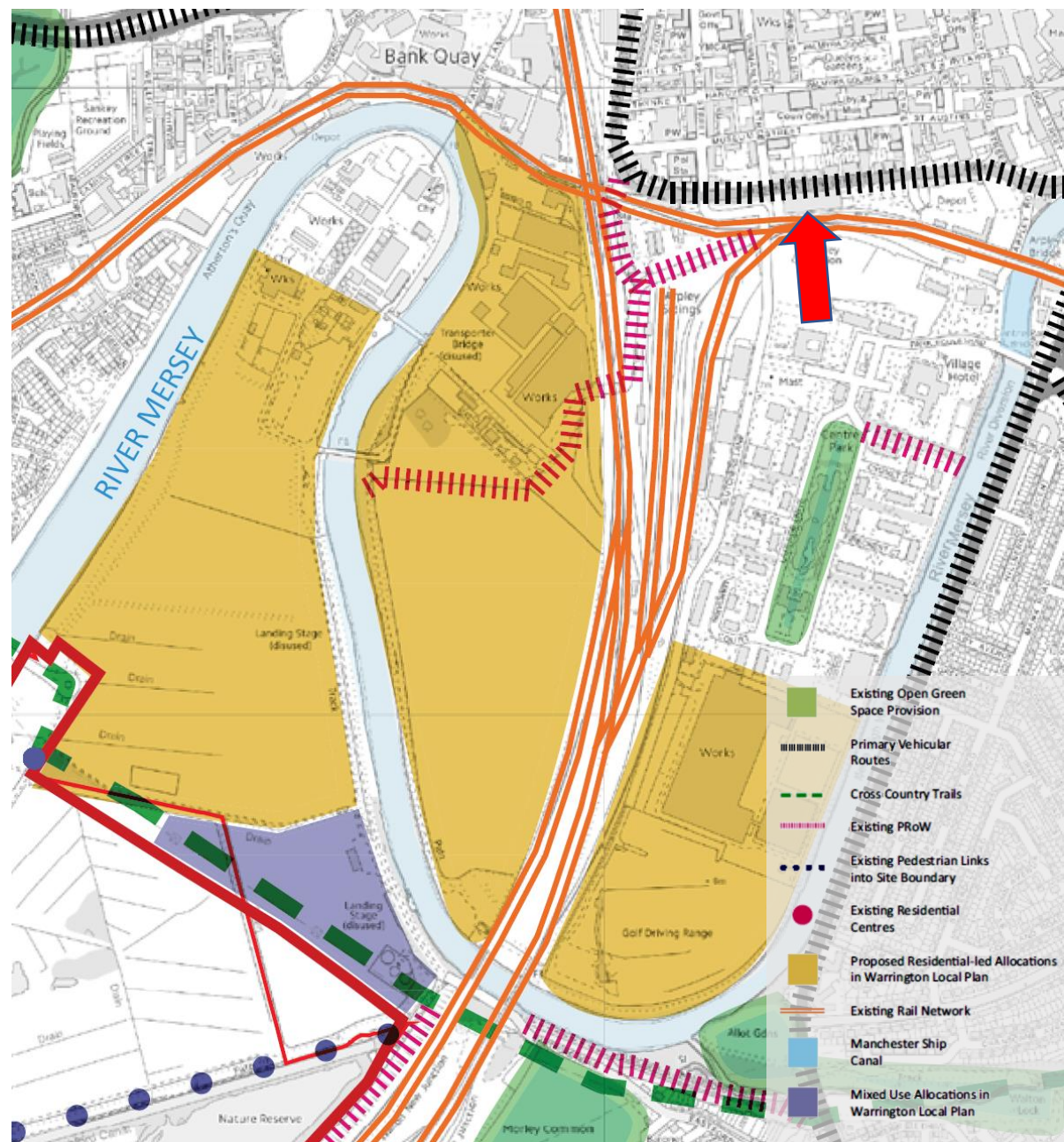
Extract from Time Square development brief:



©Warrington & Co.

- 4.11 The application site shares an equally advantageous position relative to the proposed Waterfront Redevelopment which includes the renewal of the former railway goods yard and Mr Smith's site on the corner of bridge foot. The proposal would be complimentary to the waterfront redevelopment, seeking to 'bridge' the two separate areas of residential and commercial uses with a mixed-use development at the southern edge of the town. It's close proximity to railway connections provide a clear opportunity to low-carbon city centre living.

Illustrated Extract from Warrington Waterfront development justification statement:



© MDS Transmodal

Summary

- 4.12 Noting the above factors, the proposed site engenders high-level support in both the adopted Local Plan Core Strategy and the emerging Local Plan overall. The Town Centre Master Plan is not an adopted policy and as such carries limited weight, but it is indicative of aspirations.
- 4.13 The principle of a high-density residential development is acceptable and we therefore suggest that the acceptability of the proposals depend largely on the ability to the application to demonstrate it is compatible with the constraints in the locality, which include nearby sources of noise and vibration as well as potential exposure to poorer air quality alongside heritage, and access/highways considerations.

5. REQUEST FOR BROWNFIELD REGISTER PART 2 REGISTRATON

- 5.1 Having established through this report; the TCMP and the council's pre-application advice response that the principle of residential development is acceptable, one must also consider the Council's illustration of the site in Part 1 of the brownfield register. This section makes the case that the Council should therefore enter the site into Part 2 of the Brownfield Register.

Context

- 5.2 The brownfield register seeks to speed up the delivery of residential led development. [The Town and Country Planning \(Brownfield Land Register\) Regulations 2017](#) (the Regulations) came into effect on 16 April 2017. It requires local authorities to prepare, maintain and publish a register of previously developed land (The Brownfield Land Register). Part 1 contains a list of brownfield sites considered to be suitable for housing.
- 5.3 The application site is already clearly identified on Part 1 of the Council's Brownfield Register¹ as site ref.2672 as illustrated above. The Council's position is thus that the site is considered suitable, available and achievable in line with Paragraph 2 of Regulation 4 stating:

"The [Brownfield Land Register](#) identifies previously developed land (PDL) in the borough that we've assessed as being appropriate (suitable, available and achievable) for housing development. It comprises a standard set of information to help developers identify suitable sites for housing development, speeding up the construction of new homes and maximising the number of homes built on brownfield sites. The register has been prepared in accordance with national guidelines regarding the range of site-specific information."

- 5.4 In accordance with the legislation and the guidance in the National Planning Practice Guidance (Paragraph: 002 Reference ID: 58-002-20180615), the Council may grant Permission in principle by entering a site in Part 2 of its brownfield land register which will trigger a grant of permission in principle for that land providing the statutory requirements set out in [Town and Country Planning \(Permission in Principle\) Order 2017](#) (as amended) and the aforementioned Regulations are met.
- 5.5 Thereafter, following a grant of permission in principle, the site must then apply for and receive a grant of Technical Details Consent before development can proceed. The granting of Technical Details Consent has the effect of granting a full permission for the development.

Request for entry onto Part 2 of the Register

- 5.6 Noting the above, we seek a commitment from the Council to enter the land onto Part 2 of the Brownfield Register so as to trigger the grant of a Permission In Principle. Even if a density of 360dpa is not accepted, the town centre masterplan's proposed 240dpa can be applied.

¹ <https://www.warrington.gov.uk/evidence-base-housing>. Accessed 09/07/2020

6. CONSIDERATION OF DETAILED MATTERS

6.1 Having established both through this report and the Council's previous pre-application advice response that the principle of development is considered acceptable; this section of the report explains consideration of the technical matters in order to demonstrate that the site is suitable and deliverable. The following section discusses noise, air quality and land quality in particular, so that agreement can be reached on the scope of reports and any conditions.

Noise

6.2 The Council has previously been provided with a letter dated 15th July 2020 from Dragonfly Consulting which sets out the proposed scope and methods of the intended noise surveys. It is proposed that the noise surveys shall establish the existing environmental noise levels and a range of noise sources/parameters which should be taken into account in the development.

6.3 Both the NPPF and LP policy QE6 deal with potential for unacceptable adverse impacts on amenity as a result of noise. The phraseology in the Local Plan (2014) is superseded by Paragraph 180 the NPPF (2019) which adopts the more up-to-date standard of avoiding "significant adverse impacts" and refers to the Noise Policy Statement for England (NPSE).

6.4 It is acknowledged that the application site is in a town centre location, but there are technical solutions available (such as integrations into the fabric of the building) to ensure that occupants are not exposed to unacceptable noise impacts. The submission of details can be controlled by condition on any approval notice, worded as follows (or similar):

No occupation of the approved residential element shall take place until a noise assessment to establish the external noise climate and its impacts on the proposed residential element, with a specific focus on road and commercial noise sources, has been submitted for written approval to the Local Planning Authority. The assessment should be undertaken to confirm 24h ambient and maximum noise levels, including specific data for road traffic and activities from nearby commercial operations. The assessment should also confirm what measures are required to ensure that an acceptable noise climate can be achieved within habitable rooms and amenity areas, following the guidance of BS 8233: 2014 "Sound insulation and noise reduction for buildings - Code of practice".

The measures identified and approved under part a) shall be implemented in full prior to the first occupation of the residential units hereby approved.

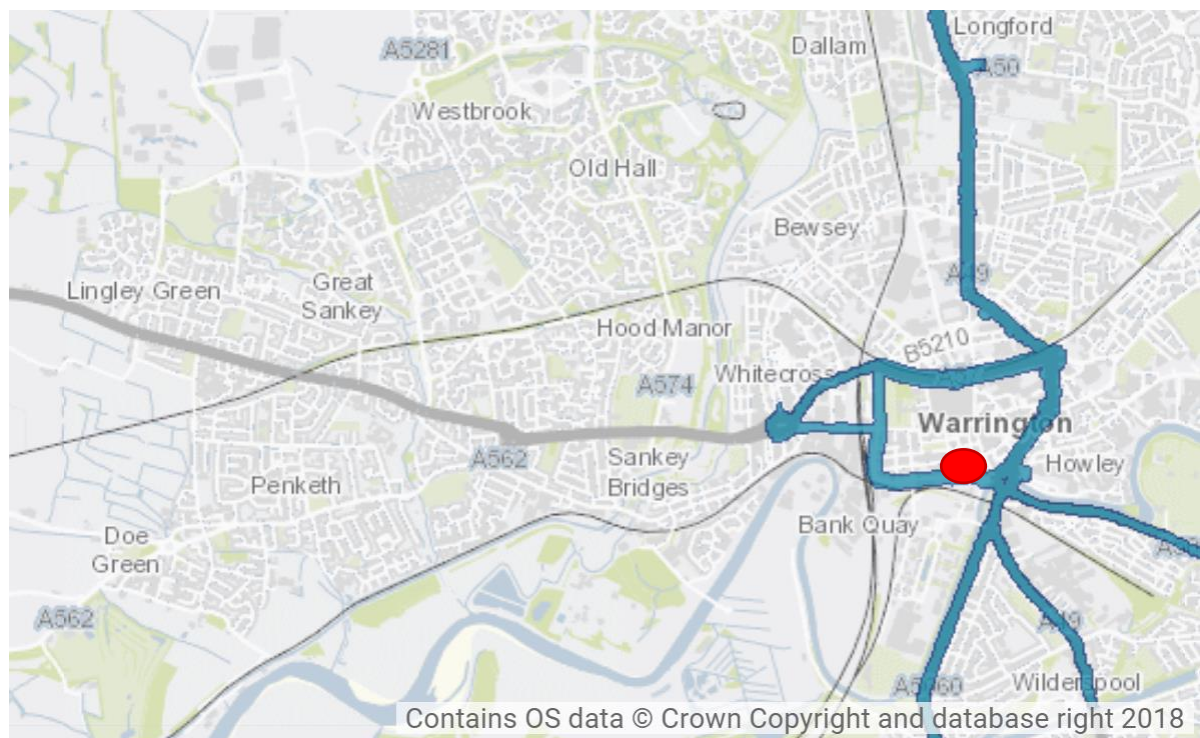
6.5 In light of the above, noise is not considered to be an impediment to a site allocation because the proposals could be made compliant with paragraph 180 of the NPPF, the NPSE and Local plan policy QE6 by providing construction details at a future stage of consideration.

6.6 We invite your agreement to the proposed methodology and scope of works.

Air Quality

- 6.7 Part IV of the Environment Act (1995) requires UK government to produce a national Air Quality Strategy (AQS) which contains standards, objectives and measures for improving ambient air quality. As required by the Environment Act, the Council has undertaken annual Review and Assessment of air quality within their area of jurisdiction. This has resulted in the Council designating an Air Quality Management Area close to the application site (although the site itself is outside it) due to high emissions from road vehicles.

Extract from DEFRA AQMA map (red dot shows site location):



- 6.8 The Council has previously been provided with a letter from Redmore Environmental Ltd dated July 2020 that highlights some elements of future change which could impact the applicant's ability to fully model mechanical and electrical ventilation systems at this early stage. Instead, it proposes the use of pre-commencement conditions to deal with certain aspects which include controlling construction dust emissions and ventilation systems. Nevertheless, there is no sound reason at this stage to think that the site is not otherwise deliverable and suitable for the proposed residential led redevelopment.

Design and heritage

- 6.9 It is considered that the only designated heritage asset to be considered is the Palmyra Square Conservation Area. A formal planning application would be accompanied by a heritage appraisal. It would follow the approach of identifying the significance(s) of heritage assets (both designated and undesignated) before commencing with a detailed discussion of the impacts of the proposal on the significance of those identified assets.

Highways, transport and sustainability

- 6.10 Policies CS4, MP1 and MP7 address Highway matters in regard to the effects and timing of traffic movements (including car parking). In combination, they seek to avoid adverse implications for the operation of the public highway network and harmful impacts on highway safety. The site's geographic location close to the major conurbations of Liverpool and Manchester (and in close proximity to the M62 and M6 motorways) provide both opportunity and challenges for the town in terms of traffic management and congestion.
- 6.11 Policy MP1 sets out the general transport principles, including the support for proposals which reduce and minimise reliance on private modes of transport. Policy MP7 addresses the requirements for transport assessments and the need to maintain safe roads and ensure that proposals do not prejudice the safe operation of the public highway.
- 6.12 A full planning application will demonstrate that the vast majority of accommodation users will not need to be private car owners, owing to the sustainable town centre location. The very small number who do can make use of the limited parking to be provided at the site.

Scope of highways assessment.

- 6.13 We have commissioned a scope of works for the project and we invite the Council's consideration and response on the proposed approach. The highways report shall:
- Set out a description of the development and relevant national and local policy. The aim being to show that the development planned is in line with local and national planning and transport Policy.
 - Describe the base transport conditions, traffic volumes, access options on foot, bike and bus/train, road safety etc.
 - Describe access by sustainable modes – this will look at the site's accessibility on foot, by bicycle and public transport.
 - Traffic generation - consider traffic generation by the development, TRICS data base will be used, selecting sites in a similar central location as this site. The analysis will also take account of the traffic presently generated by Go-Outdoors as this is already on the network and will need discounting, noting the potential for differing peaks.
 - The generated trips will be assessed by mode, having regard to NOMIS data for the local area. Traffic will then be assigned to the local road network also using NOMIS data. The 2020 base traffic flows will be growthed for 10 years in the future based on TEMPRO projections.
- 6.14 In addition to the above, highways report will include:

- i) Consideration of the growthed localised NOMIS data (Table 2 of the SPD Warrington Borough Council Standards for Parking in New Development, 2015), the site location and other travel options to clearly explain and justify the proposed parking numbers which have been devised for inclusion in the scheme;
 - ii) More detailed consideration is to be given to the means of access. Current draft proposals show access from Bold Street (retained) with additional access from Wilson Patten Street;
 - iii) Layout analysis. The report shall demonstrate that the proposed (indicative) layout is serviceable by refuge vehicles etc and turning areas within the development site;
 - iv) Consideration will be given, to the degree reasonably necessary, the realignment of the Western Road link as a committed development in the locality.
- 6.15 Service Management Plan; Parking Management Plan and Construction Management Plan shall be dealt with by imposition of a suitably worded planning condition on the permission.
- 6.16 We invite your agreement to the proposed methodology and scope of works.

Drainage

- 6.17 Policy QE4 and NPPF Paragraphs 163 to 179 relate to flood risk, drainage and potential water pollution. The application site is not located within Flood Risk Zones 2 or 3. It is located within Flood Zone 1 (very low probability) as defined by the Environment Agency Flood Map for Planning (2018). This means it has a less than 0.1% (1 in 1000) annual probability of pluvial flooding (flooding from rivers and the sea). Nor is the site within a Critical Drainage Area.

See Flood Risk Map for planning

- 6.18 The submission of a drainage strategy for the site can be required by condition prior to commencement of development to ensure that the strategy complies with Policy QE4 and NPPF Paragraph 163 with regard to the disposal of surface water run-off and foul waste.
- 6.19 This matter can be dealt with in detail at the Reserved Matters or conditions discharge stage.

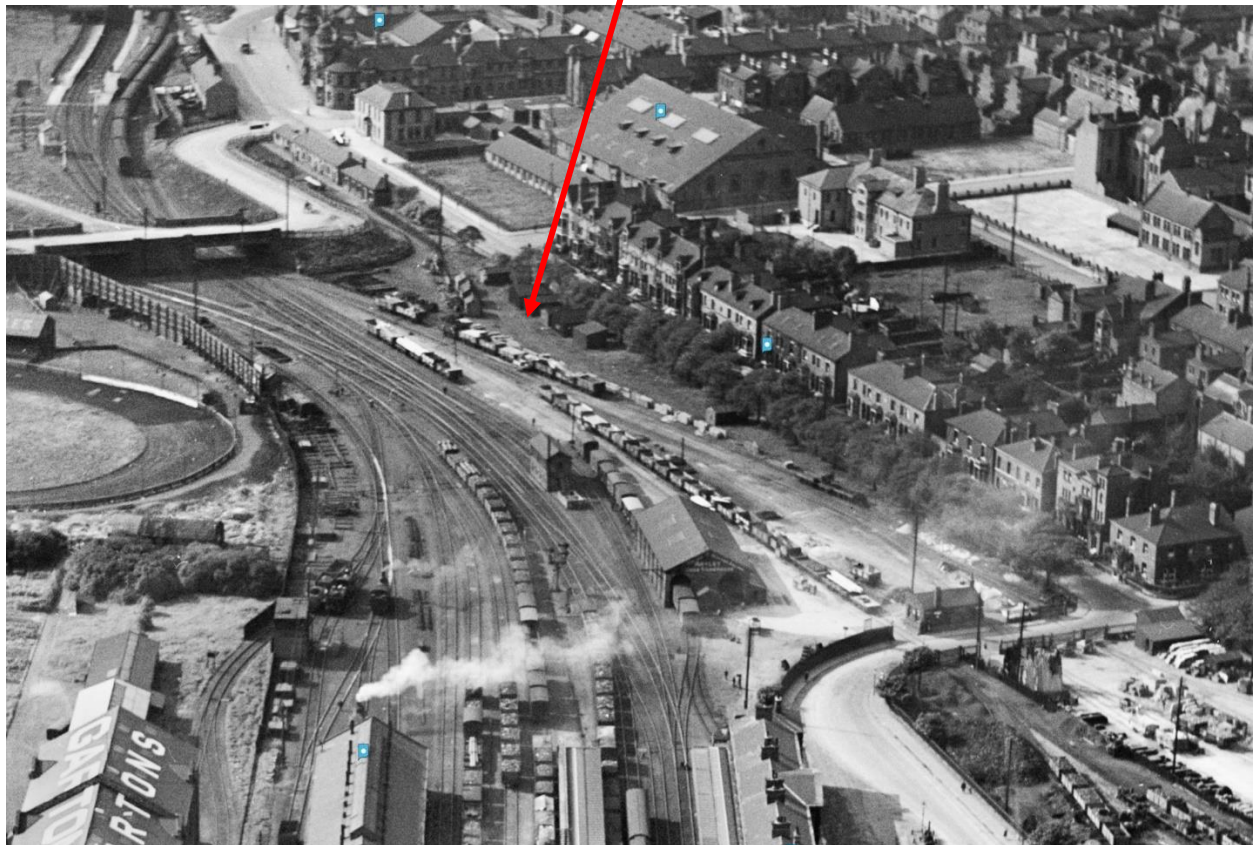
Archaeological implications

- 6.20 The application site is beyond the reasonable zone of influence of the former Austin priory and comprises land which formerly formed part of the Arpley Junction railway sidings dating to the 1800's. It is presently covered by built development comprising buildings and car parks.
- 6.21 It is considered that subject to verification in an initial scoping report from a qualified heritage consultant, no additional Archaeology investigations are expected to be warranted.

Land Quality

- 6.22 NPPF paragraphs 178 to 179 and Local plan Policy QE6 deal with emissions to ground, land, air or water such as pollutants, noise, odour, air quality and lighting. It also considers land quality, including consideration of above surface water and ground water sources. It requires that where proposals are submitted on land which is *known or suspected* to be affected by contamination, they must include a competent assessment. Permission will be approved where the land is or can be made suitable for the proposed end use.
- 6.23 In this case, comprises land which formerly formed part of the Arpley Junction railway sidings dating to the 1800's. It is presently covered by buildings and a surface level car park.

Aerial photo of application site circa 1930:



©Historic England EPW034309

- 6.24 It is anticipated that the Council's EHO will request commissioning of further ground investigation works; most particularly following demolition of the existing building. Noting that the most recent land uses are relatively well understood and evidenced, it is expected that the Council will impose a condition for ground investigation works following demolition rather than to require this as part of the up-front validation, only for that work to have to be repeated once and Outline permission has been obtained. We seek a pragmatic approach on the issue.
- 6.25 At present, all indications are that in spite of previous land uses, the ground conditions at the site are unlikely to prevent or unreasonable impede the redevelopment of the land.

7. OBJECTION TO POLICY INF2

- 7.1 We understand that policy INF2 aims to protect land needed to enable infrastructure works and delivery of those works, will in turn, assist delivery of the local plan aspirations.
- 7.2 However, some of the land identified at Wilson Patten Street and proposed for safeguarding under policy INF2 appears to include land that no longer needs to be safeguarded because we understand that the road improvements to Slutchers Lane have already been completed. The Centre Park Link Compulsory Purchase Order 2018 was brought into effect and in so doing, the land necessary to enable the improvement works has been obtained. Full details are found here <https://www.warrington.gov.uk/centre-park-link-compulsory-purchase-order>.
- 7.3 The additional area of land, illustrated and outlined in green on the map extract below can presumably now be removed from the safeguarding policy. Doing so will provide increased flexibility to bring forward the redevelopment of land south of Wilson Patten Street for residential uses in the town-centre and remove a potential impediment to these proposals.



8. PROPOSED AMENDMENT TO POLICY TC1

- 8.1 We acknowledge that the areas around Bank Quay are located both within Inner Warrington and the Town Centre (policies DC1 and TC1 respectively). However, there is no bespoke allocation proposed within the development plan to give effect to the Town Centre Masterplan aspirations. In this regard, the emerging local plan is failing to take up a clear opportunity to promote the redevelopment of brownfield sites in the town centre and core urban areas.
- 8.2 The masterplan is not an adopted policy document and so it does not currently carry any material weight in decision making (as it does not form part of the development plan). And so, in order to give increased confidence to the market and promote redevelopment of these urban locations, a bespoke allocation for the site(s) would be both welcome and encouraged.

9. OBJECTION TO POLICY ENV3

- 9.1 Policy ENV3 is a protective policy which seeks to prevent mineral resources being sterilised by other forms of non-mineral development. Within the draft plan, swathes of the town centre are shown as being included within policy ENV3. Whilst there is a list of exceptions to the policy within Table 9 of the draft plan (para 9.3.12), the criteria are unnecessarily narrowly defined.
- 9.2 The reality is that mineral extraction works in these town centre locations are unlikely, certainly for longer term extraction. The implications for traffic, air quality, noise, dust and vibration make long term extraction in these locations a challenging proposition. Moreover, land values and market demands are likely to dictate that such land is put to residential and commercial developments first, and this would accord with broader town centre policy ambitions.
- 9.3 This being so, it is not reasonable or necessary to safeguard land within the town centre boundary (policies TC1 and DC1) for potential mineral extraction. We would propose that policy EV3 is amended to add exclusion no, xiii) to Table 9 so that residential and commercial developments within the Town Centre TC1 do not need to consider Minerals Safeguarding.

10. CONCLUSIONS

- 10.1 The overall aspiration to increase housing delivery in urban areas is acknowledged and accepted. However, we submit that a more positive and proactive approach toward promoting redevelopment of town centre brownfield land should be encouraged by the plan.
- 10.2 Alterations to policies INF2; ENV3 and TC1 as well as a bespoke allocation for the land fronting Wilson Patten Street would help to ensure that the draft plan is positively prepared and ultimately in so being, achieved compliance with national policy embodied in the NPPF. Accordingly, we seek these amendments to the policy wording and inset maps.

Date. 15th November 2021
Our ref. BRE680/28
Your refs.
Contact us. [REDACTED]



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

BY EMAIL

Dear Sirs

PROPOSAL: RESPONSE TO WARRINGTON LOCAL PLAN (DRAFT SUBMISSION VERSION, 2021)
LOCATION: GO OUTDOORS & LAND SOUTH OF WILSON PATTEN STREET, WARRINGTON, WA1 1PS.

This letter is a consultation response to the emerging Warrington Local Plan (Submission Version) submitted on behalf of our client Chesro Ltd and the freehold landowner.

The site is a proposed residential development site promoted by our client and brought forward for pre-application advice under application ref. PR2020/04486. Regrettably, this site and wider land identified in the town centre masterplan has not been selected for allocation in spite of re-drafting the local plan and seemingly the merits of a bespoke allocation for the site have not been reappraised.

The council can presently only demonstrate a 3.4-year housing land supply, failing all three requirements in the government's housing delivery test and failing to satisfy NPPF policy 111 (as well as its adopted local plan). Ultimately whilst generally supporting the Council's redevelopment aspirations we submit that the Council should and indeed must do more to allocate and promote redevelopment of urban land, including this proposed development site.

We therefore seek amendments to policies INF2; ENV3; DC1 and TC1 in order ensure that the plan is sound by being positively prepared and deliverable. We would welcome, as ever, your positive engagement with us to progress this proposed allocation.

Kind regards

[REDACTED]
Dan Matthewman LL.B (Hons) MSc ACILEx MRTPI
Managing Director

COUNTY PLANNING LTD



[REDACTED]
www.CountyPlanning.co.uk



Date. 15th November 2021
Our ref. BRE680/28
Your refs. PR2020/04486
Contact us. [REDACTED]



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

BY EMAIL

Dear Sirs

PROPOSAL: RESPONSE TO WARRINGTON LOCAL PLAN (DRAFT SUBMISSION VERSION, 2021)

LOCATION: GO OUTDOORS & LAND SOUTH OF WILSON PATTEN STREET, WARRINGTON, WA1 1PS.

This letter is a consultation response to the emerging Warrington Local Plan (Submission Version) submitted on behalf of our client Chesro Ltd and the freehold landowner.

The site is a proposed residential development site promoted by our client and brought forward for pre-application advice under application ref. PR2020/04486. Regrettably, this site and wider land identified in the town centre masterplan has not been selected for allocation in spite of re-drafting the local plan and seemingly the merits of a bespoke allocation for the site have not been reappraised.

The council can presently only demonstrate a 3.4-year housing land supply, failing all three requirements in the government's housing delivery test and failing to satisfy NPPF policy 111 (as well as its adopted local plan). Ultimately whilst generally supporting the Council's redevelopment aspirations we submit that the Council should and indeed must do more to allocate and promote redevelopment of urban land, including this proposed development site.

We therefore seek amendments to policies INF2; ENV3; DC1 and TC1 in order ensure that the plan is sound by being positively prepared and deliverable. We would welcome, as ever, your positive engagement with us to progress this proposed allocation.

Kind regards

[REDACTED]

Dan Matthewman LL.B (Hons) MSc ACILEx MRTPI
Managing Director

COUNTY PLANNING LTD



[REDACTED]



www.CountyPlanning.co.uk

