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Warrington Borough Council

Local Plan Review

Regulation 18 Consultation: Standard Response Form

October 2016

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1: Contact Details (Compulsory)

Title:

First Name:

Last Name:

Organisation (if applicable):

Address:

Phone Number:

E-mail:

2: Questions

Question 1

Do you have any comments to make about the Council's evidence base?

Question 2

Do you consider the assessment of Housing Needs to be appropriate?

Question 3

Do you consider the assessment of Employment Land Needs to be appropriate?

Question 4

Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

Question 5

Do you consider the assessment of Land Supply to be appropriate?

Question 6

Do you consider that Green Belt land will need to be released to deliver the identified growth?

Question 7

Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

Question 8

Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?

Question 9

Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?

Question 10

Do you consider the Sustainability Appraisal Scoping Report to be appropriate?

Question 11

Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

Question 12

Do you agree with the assessment of Local Plan Policies at Appendix 1?

Question 13

Do you consider the proposed 20 year Local Plan period to be appropriate?

Question 14

Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

3: Responses

Question 1

Question 2

Question 3

Question 4

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Question 11

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Question 14



Warrington Borough Council
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New Town House
Buttermarket Street
Warrington
WA1 2NH

FAO: LDF/Policy Team

5 December 2016

By email and post
ldf@warrington.gov.uk
let.002.SW.SW.25900001

Dear Sarah

WARRINGTON LOCAL PLAN REVIEW – REGULATION 18 CONSULTATION

On behalf of the joint landowners of land situated to the north of Higher Lane (A56) Lymm, namely; Mr D Girvin; Ms M Wronko and Mr I Pimlott, please find enclosed our submissions in response to the Regulation 18 Consultation on the Warrington Local Plan Review.

By way of context, our clients control a sizeable piece of land extending to 29.3Ha on the eastern edge of Lymm (Site Location plan enclosed). The site is currently designated Green Belt and is being promoted for release and development through the current Local Plan Review process.

A separate submission to the 'Call for Sites' consultation has been made, supported by not only the completed Response Form but a Development Statement and suite of technical reports (bound together as a Technical Appendix) which demonstrate the suitability and deliverability of the site for development.

Local Plan Review

Aside from this and set out below is our initial response to selected questions posed on the 'Standard Response Form', dealing more generally with the overall plan strategy and evidence base published thus far by the Council. More detailed comments will be provided at subsequent stages of the local plan preparation process.

A completed copy of the Standard Response Form is enclosed but taking each of the key questions in turn:

Question 1: Do you have any comments to make about the Council's evidence base?

Overall, the proposed scope of the Council's evidence base required to underpin the Local Plan Review is appropriate. However, we do note that there is currently a lack of information with regards the following:

- the extent to which the Council is able to satisfy its proposed future housing requirement (i.e. the 20,000 figure), in particular, the breakdown of sites (and their trajectories) that makes up the Council's suggested deliverable figure of 15,000 during the next 20 years;
- the lead-in times and delivery rates that have been assumed for different types of sites;
- there appears to be a mismatch between the figures cited in paragraphs 2.15 and 2.16 of the Scope and Contents Document and the information contained at Table 1 of the Urban Capacity Statement (2016);
- the extent to which the Council's forecast capacity comprises sites with/without planning permission (including whether these are full detailed or outline consents and when they were granted);
- it is unclear as to whether any of the forecast capacity relates to Green Belt sites;
- there is only limited information available with regards past completions since the start of the current plan period (2006) and the extent to which these have related to brownfield/greenfield and/or Green Belt sites;
- there is currently no information provided about housing needs in individual settlements across the Borough (the published SHMA addendum currently only deals with forecast housing need at a strategic level and across the Warrington housing market area as a whole). We anticipate that this will be required in underpinning decisions about the proposed direction of new housing and employment development and, in particular, the extent to which the Green Belt boundaries will need to be redrawn around the urban area and key settlements including Lymm;
- equally, there will need to be some form of settlement assessment undertaken, to establish the extent to which areas such as Lymm have the capacity (in terms of access to services, facilities and public transport links) to accommodate new development.

Additionally, we anticipate that the Council will need to produce a document summarising the extent to which it has cooperated with neighbouring authorities pursuant to the Duty to Cooperate requirements of the National Planning Policy Framework (NPPF) (2012). This is particularly important given that the 2016 Strategic Housing Market Assessment (SHMA) was undertaken as a joint study assessing Warrington alongside St Helens and Halton and at a sub-regional level, work on the draft Greater Manchester Spatial Framework (GMSF) is now underway. This includes an assessment of the Green Belt where it extends from Salford/Trafford towards Warrington.

Clearly, there does need to be some joined up thinking between the different plan makers to ensure consistency, particularly given that the Warrington Green Belt extends beyond the Borough boundary.

Question 5: Do you consider the assessment of Land Supply to be appropriate?

Given the relatively limited amount of information available with regards the overall assessment of land supply at this stage (noted above), it is not possible to comment on the Council's overall approach or individual sites contained within and presumed to be deliverable in coming years.

Notwithstanding, we do note that the Council has made a windfall allowance (64 dwellings per annum) and is reliant on a contribution from windfall sites for the first 15 years of the plan (some 960 dwellings).

However, this allowance is based solely on evidence of historic completions from this source in past years (2009/10 to 2014/15, some five years) and indeed, the average has been increased by the level of windfall completions in the final two monitoring years (as opposed to the first three). To this end, the average completion level is actually less (some 41 dwellings per annum) and probably more representative of the level of windfall development that might need to come forward in future years.

That said, any planned windfall allowance does need to be justified and it is difficult to see how this can be, particularly in the first few years of the new plan, when the five year housing land supply will need to be demonstrably evidenced and inevitably based on either existing planning permissions or proposed allocations. The Council's current approach is likely to lead to a degree of double counting, particularly given the fact that it is not apparent whether any existing permissions have been discounted (in terms of delivery assumptions).

Paragraph 48 of the NPPF is clear that Local Planning Authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. However, any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends. It is not currently evident that such an assessment has been undertaken and this needs to be addressed by the Council.

Question 6: Do you consider that Green Belt land will need to be released to deliver the identified growth?

We strongly agree that Green Belt land will need to be released if the Council is to meet its forecast housing and employment land requirements for the future plan period.

Additionally and having regard to the permanence of Green Belt policy i.e. that it should be enduring for future plan reviews, it is likely that the Council will also need to Safeguard additional land, in the event that planned sites do not come forward as envisaged in the plan period and/or additional growth needs are required as part of a further future interim plan review.

In this regard, our clients land at Lymm is being promoted as a suitable Green

Belt site for release and a Development Statement has been submitted in parallel to these comments (in response to the Call for Sites consultation), setting out its deliverability and suitability for development in the short term.

Question 7: Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan Review?

We agree that the three broad areas identified at Section 3.6 of the Scope and Contents Document are appropriate as the initial focus of the Local Plan Review, however, we do seek the Council's confirmation that in addressing, in particular, the future planned housing and employment land requirements of the Borough, a thorough assessment of the extent to which the Green Belt boundary ought to be redrawn and the proposed apportionment of growth to individual settlement areas, will be established as part of the current process.

Question 8: Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?

Absolutely. As set out in response to Question 6 above, it is incumbent upon the Council to define new Green Belt boundaries having regard to potential longer term development needs, stretching well beyond the plan period (NPPR, paragraph 85).

Question 11: Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

Yes, this is considered appropriate at this stage but we reserve the right to comment further on methodological issues once further evidence has been prepared in due course.

Question 13: Do you consider the proposed 20 year Local Plan period to be appropriate?

Yes, this is considered appropriate at this stage and in conformity with the requirements of the NPPF (paragraph 157) which requires that Local Plans be drawn up over an appropriate time scale, preferably a 15 year time horizon, to take account of longer term requirements.

Question 14: Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

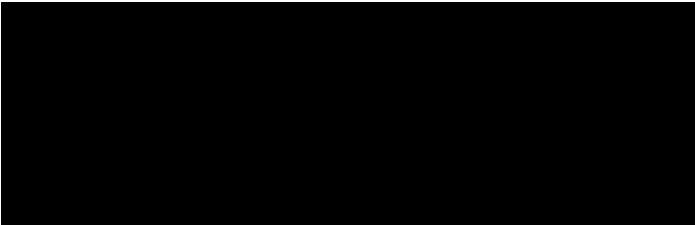
As set out in our response to Question 1 above, further evidence base work is needed in underpinning the draft strategy for growth over the next 20 years. Undertaking this work should enable the Preferred Option consultation draft to clearly identify the Council's proposed growth needs, including where (spatially) these are to be met and in doing so, the extent to which Green Belt boundaries both around the core Warrington urban area and key settlements such as Lymm, will be redrawn and allocations of land brought forward.

Summary and next steps

We trust that these comments alongside our submissions in support of the 'Call for Sites' (provided separately) will be duly taken into consideration by the Council as part of its evidence base underpinning the Local Plan Review.

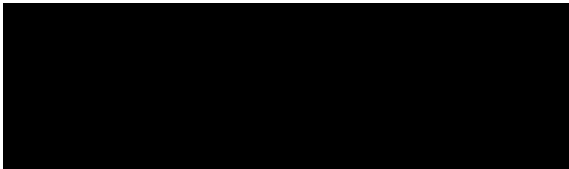
It has been evidenced that our clients site in Lymm is more than suitable for release from the Green Belt and to be brought forward for development to help meet the future growth needs of the village and we look forward to discussing the opportunity this site presents in due course with the Council.

In the meantime, should you have any queries or require any further information, please do not hesitate to contact us.

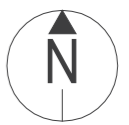
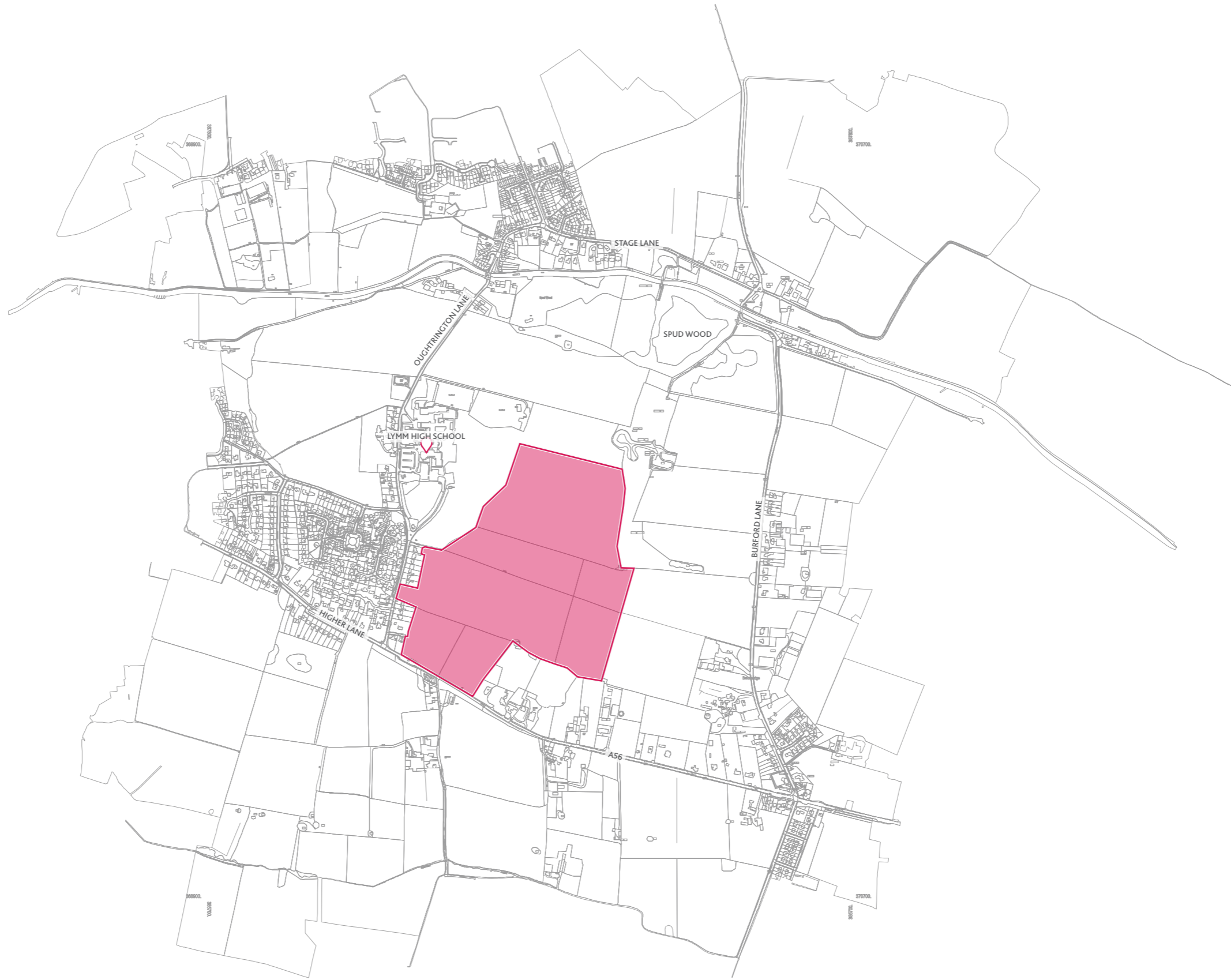


Sarah Wozencroft

Enc: Site Location Plan
Completed Regulation 18 Consultation Standard Response Form



Site plan



1:1250 @ A3