

SATNAM PLANNING SERVICES

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Our Ref: PH reps.

5th December 2016 2016

Planning Policy
Warrington Borough Council
New Town House, Buttermarket Street
Warrington
WA1 2NH

By email only; ldf@warrington.gov.uk

Dear Sirs,

**Re: Local Plan Review, Regulation 18 Consultation, Scope and Contents Document, October 2016
Call for Sites, October 2016
For: Peel Hall, Warrington: Satnam Millennium Ltd.**

We act on behalf of Satnam Millennium Ltd with regard to their land holding at Peel Hall, Warrington. You will be aware of the various policy documents that refer to this land, including the SHLAA and the recent planning application (registered as 2016/28492 in August 2016).

Additional representations in respect of Peel Hall are also submitted by Nathaniel Litchfield and Partners regarding demographics and land supply issues. These should be read alongside these more general site related representations.

Local Plan Review.

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

No comment; see representations by NLP.

2. Do you consider the assessment of housing needs to be appropriate?

The council's acknowledgement that the previous estimates need to be increased is welcomed. The proposals are still inadequate however, and we refer to the report prepared by NLP setting out the critique of the approach and revised assessment calculations.

3. Do you consider the assessment of Employment needs and job's growth to be appropriate?

We have no comments to make on this aspect at this time.

4. Do you consider the alignment of housing needs and job's growth to be appropriate?

We are supportive of the council's aim to align job's growth and housing need. Full consideration of this is set out in the NLP report.

5. Do you consider the assessment of land supply to be appropriate?

The consideration of this issue is set out in the NLP report.

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

The release of green belt land to satisfy housing needs appears to be inevitable and we welcome the start of that process by the council. Clearly all land not located within the green belt needs to be examined and tested for suitability for housing prior to such releases taking place, and phasing policies to achieve this considered for the plan. We note the SHLAA and the draft plan conclude that Peel Hall must be allocated for developed before land is released from the green belt.

7. Do you consider the 3 identified strategic matters being the appropriate initial focus of the local plan review?

The 3 strategic matters fall into two categories, first being can Warrington as a whole accommodate the housing and employment needs set out in the plan and as emerging from the NLP report? Our view on this is that Warrington must accommodate these levels of development, as if the plan fails to deliver these rates of development on suitable sites then issues of underperformance and lack of delivery will exist. Secondly, the third issue relates to how that rate of development can be used to deliver new and improved physical and social infrastructure to meet local needs and mitigate impacts on communities. Our view on this is that the plan must achieve such a balance in the medium and long terms. Existing infrastructure shortfalls need to be assessed and provided for with council focus and monies where necessary.

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?

The allocation of safeguarded land for longer term development is supported and is necessary. We suggest that a 15 year time horizon beyond the end of the plan period is required.

9. Do you consider it appropriate to include minerals and waste and gypsy and traveller needs in the scope of the local plan review?

We have no comments on this issue at this time.

10. Do you consider the sustainability appraisal scoping report to be appropriate?

The scoping report for the SA appears to be comprehensive in its review of relevant legislation and regulation, and seeks to set out the approach once the local plan strategy is determined at future stages of the plan. The SA however, should begin with an objective assessment of the potential options for growth (or not) at Warrington (the alternatives), and it is unclear whether this has been undertaken (robustly) at this stage. If expansion into the green belt is required and considered to be supportable by SA assessment, then the green belt review itself and potential site releases/ scoring system need to be subject to SA in due course. We reserve our right to consider this issue in more detail at the appropriate time.

11. Do you consider the spatial distribution and site assessment process at Appx 2 to be appropriate?

We agree the essence of the proposed spatial distribution set out with the proviso that the SHLAA sites are considered as the first rank potential housing sites, with potential green belt release sites providing the further housing (and employment) required to meet assessed needs. The release from the green belt should not be seen as an enlargement of the current pool of potential SHLAA sites, but as an additional pool to be used after the SHLAA sites have been assessed and released for housing.

12. Do you agree with the assessment of local plan policies at Appendix 1.

We have no comment to make on this at this time.

13. Do you consider the proposed 20 year local plan period to be appropriate?

We agree with the council regarding the length of the plan period. There should also be a 15 year time horizon post plan period associated with safeguarded land. This is set out further in the NLP report.

14. Is there anything else you feel we should include within the preferred option consultation draft?

The next version of the local plan should be a consultation draft plan, not preferred options, as the issue of green belt release will be a major topic that full consideration of public concerns and comment is vital. To present local residents with a preferred approach in this regard will stifle and shorten the period for the public consideration of alternatives and sites.

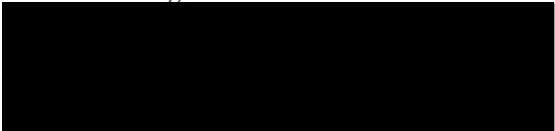
Call for Sites.

The documentation you have in respect of Peel Hall (set out in the ES and planning application documents 2016/28492) should be classed as our response to the call for sites request.

This provides definitive and extensive information setting out that Peel Hall is appropriate, suitable, available and viable for housing development. We also rely on the information and findings of the latest council SHLAA regarding the suitability of the site for residential development.

We look forward to constructive engagement in the local plan review process as it develops over the coming months,

Yours faithfully,



Colin Griffiths BA(Hons) MRTPI.

Managing Director