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Warrington Borough Council

Local Plan Review

Regulation 18 Consultation: Standard Response Form

October 2016

1: Contact Details

This representation by Berrys is on behalf of our client, Mr David Beattie, [REDACTED]
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	along this southern boundary. Overall the parcel makes a weak contribution to checking unrestricted sprawl.”	
2: to prevent neighbouring towns merging into one another	“ Weak contribution: The parcel forms a less essential gap between Newton-le-Willows and the Warrington urban area whereby development of the parcel would slightly reduce the gap between the towns however would not result in them merging. Overall, the parcel makes a weak contribution to preventing towns from merging.”	no comments
3: to assist in safeguarding the countryside from encroachment	“ Strong contribution: The boundary between the parcel and the settlement is the M62 and Delph Lane which is durable and would prevent encroachment. The boundaries between the parcel and the countryside consist of Mill Lane to the west which is durable and to the north and east is dense tree lining some of which is durable however may not be permanently durable enough to prevent encroachment beyond the parcel in the long term. The parcel is well connected to the countryside along three boundaries. The existing land use consists of open countryside. The parcel is flat, with no built form, minimal vegetation and open long line views and thus it supports a strong degree of openness. Overall, the parcel makes a strong contribution to protecting the countryside from encroachment.”	<p>Arup’s statement that the parcel “<i>is well connected to the countryside along three boundaries</i>” is incorrect and at odds its earlier statement that the western boundary is Mill Lane and the northern and eastern boundaries are dense tree lining.</p> <p>Furthermore, Arup’s statement that there are “<i>long line views</i>” is incorrect, as it is not possible to see the wider countryside beyond the parcel, due to mature tree belts around the parcel.</p> <p>A more accurate statement would be that, ‘the parcel is connected to the countryside along its northern boundaries, although a mature tree belt limits long line views.’</p> <p>We consider that the contribution should be amended to ‘moderate’. This would not change the overall assessment.</p>
4: to preserve the setting and special character of historic towns	“ No contribution: Warrington is a historic town however the parcel is not within 250m of the relevant Conservation Areas. The parcel does not cross an important viewpoint of the Parish Church.”	no comments
5: to assist in urban regeneration, by encouraging the recycling of	“ Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.”	Keeping this site undeveloped makes a weak contribution to this purpose of the Green Belt. It would be much better for the site

derelict and other urban land		to support economic regeneration in the area through its removal from the Green Belt altogether.
Overall Assessment	<p>“The parcel makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to two, and no contribution to one. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The parcel has been judged to make a moderate overall contribution as although it supports a strong degree of openness and the boundaries between the parcel and the countryside are not permanently durable, the boundaries between the parcel and the settlement consisting of the M62 and Delph Lane are durable enough to prevent development from encroaching into the parcel and therefore not threatening the openness and permanence of the Green Belt. The parcel makes a moderate contribution in assisting in urban regeneration.”</p>	<p>Arup’s statement that the parcel, “<i>supports a strong degree of openness</i>” under purpose 3 is inconsistent with the visual containment of the site by mature trees, the M62 and railway line. This should be amended. The parcel consequently makes only a moderate contribution to purpose 3.</p> <p>In summary, the parcel makes a moderate contribution to two purposes, a weak contribution to two, and no contribution to one.</p> <p>Overall, it makes only a moderate contribution to the Green Belt and would make a better contribution to economic regeneration if it were removed from the Green Belt altogether.</p>

Green Belt Parcel WR6, Winwick

There are a number of inaccuracies in Arup’s assessment, particularly under Purpose 3 and the Overall Assessment, as detailed below.

Purposes of the Green Belt	Arup comments on parcel WR6 (page H19)	Our comments
1: to check the unrestricted sprawl of large built-up areas	<p>“Weak contribution: The M62 forms a durable boundary between the parcel and the built up area. This is a permanent boundary that is durable enough to prevent sprawl into the parcel in the long term. The parcel is only connected to the urban area along this southern boundary. Overall the parcel makes a weak contribution to checking unrestricted sprawl.”</p>	no comments
2: to prevent neighbouring towns merging into one another	<p>“Weak contribution: The parcel forms a less essential gap between Newton-le-Willows and the Warrington urban area whereby development of the parcel would slightly reduce</p>	no comments

	the gap between the towns however would not result in them merging. Overall, the parcel makes a weak contribution to preventing towns from merging.”	
3: to assist in safeguarding the countryside from encroachment	<p>“Strong contribution: The boundary between the parcel and the settlement is the M62 to the south and the Winwick Link Road (A49) to the north with Winwick, both of which are durable boundaries and would prevent encroachment. The boundaries between the parcel and the countryside consist of the Winwick Link Road (A49) to the west which is durable and could prevent encroachment.</p> <p>To the east is a track and field boundaries which are not durable and would not prevent encroachment beyond the parcel if the parcel were developed. The existing land use consists of open countryside in agricultural use as well as a private hospital to the south of the parcel. The parcel is only connected to the countryside along two boundaries.</p> <p>The parcel is flat, with approximately 20% built form and some areas of vegetation concentrated around the hospital however the remainder of the parcel has long line views. The parcel supports a moderate degree of openness. Overall, the parcel makes a strong contribution to protecting the countryside from encroachment due to the existing encroachment and the non-durable eastern boundary with the countryside.”</p>	<p>Arup’s statement that the parcel is connected to the countryside along two boundaries is inaccurate; in reality, it has urban form on three sides.</p> <p>The parcel only has long-line views of the countryside in one direction, namely eastwards.</p> <p>We consider that the contribution should be amended to ‘moderate’. This would not change the overall assessment of ‘moderate contribution’.</p>
4: to preserve the setting and special character of historic towns	“No contribution: Warrington is a historic town however the parcel is not within 250m of the relevant Conservation Areas. The parcel does not cross an important viewpoint of the Parish Church.”	no comments
5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	“Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.”	This site could encourage regeneration by making best use of the strategic node of a motorway junction. Keeping it ‘open countryside’ does <i>not</i> help urban regeneration.
Overall Assessment	“The parcel makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to two, and no contribution to one. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The parcel has been judged to make a moderate overall contribution as although the boundaries between the parcel and the countryside are not all durable, the boundaries between the parcel and the settlements consisting of the M62 and the A49 are durable enough to prevent development from encroaching into the parcel and therefore not threatening the openness and permanence	We consider that this should be amended to a moderate contribution to two purposes, a weak contribution to two, and no contribution to one. The overall contribution is weak to moderate .

	of the Green Belt. The parcel makes a moderate contribution in assisting in urban regeneration.”	
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Next steps for the Green Belt Assessment

The Green Belt Assessment is an initial assessment only, and its authors recognise, “*there will be the need to undertake more detailed site specific assessment work as part of the Local Plan Review process.*” (paragraph 6, page 1 of Arup’s report).

We trust that our comments on the Green Belt Assessment above are input into the next stage, in which further, more detailed and accurate assessment will take place in relation to sites submitted as part of the Council’s ‘Call for Sites’ process.

Question 2

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

The 'objectively assessed need' for 839 new homes per annum, increased to around 1,000 new homes per annum to accommodate the borough's aspirations for economic growth, does not make sufficient adjustment for market signals as required by the third Core Planning Principle in paragraph 17 of the National Planning Policy Framework. This Core Planning Principle states that:

"Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities." (NPPF paragraph 17, 3rd bullet point)

The importance of market signals is elaborated in the National Planning Practice Guidance. This states:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand." (NPPG, paragraph 2a-019).

"A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections." (NPPG, paragraph 2a-020).

To be consistent with the Framework and NPPG, sufficient adjustment must be made for market signals in deriving Warrington Borough Council's housing requirements.

Market signals should be taken into account not only in relation to the overall figure, but also in relation to the distribution of development within the borough council's area.

Question 3

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

It is disappointing that Warrington Borough Council is planning for *less* economic growth than in its recent history. This does not sit well with the National Planning Policy Framework's focus on planning being a means of delivering growth. It is also at odds with the 'Northern Powerhouse' ambitions of the North West. It would be preferable for the Council to take a more positive approach to economic development.

Question 4

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

Agree

Question 5

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

No, the land supply assessment takes an over-optimistic approach to delivery and is not informed by an up-to-date development viability assessment.

The SHLAA study is used uncritically to inform the Council's estimated housing land supply, set out in its Urban Capacity Statement. Experience shows that not all the SHLAA sites will transpire into delivery on the ground. Some will not come forward due to landownership issues, financial viability issues, business continuity issues and a host of other reasons. There is no allowance for the inevitable proportion of sites that do not come forward (a "non-implementation" allowance). Consequently, the Council's estimated land supply is unrealistically high.

The Council's latest published Viability Assessment is dated September 2010, and is now very out-of-date. This should be updated and used to inform deliverability as well as informing the provision of affordable housing in the borough.

In summary, the Council's assessment of Land Supply is considered to be unrealistic.

Question 6

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

Agree

Question 7

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

Agree

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?

Agree. A longer term perspective is necessary, because the National Planning Policy Framework requires any review of Green Belt boundaries to have, "*regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*" (NPPF paragraph 84).

Consequently this once-in-a-generation Green Belt review needs to consider the release of enough Green Belt land to cater for two plan periods, as neighbouring local planning authorities have done, in order to be consistent with the Framework.

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?

Agree

Question 10

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

The SA appraisal Framework could be improved in the following ways:

Draft SA appraisal criteria	Comments
Strengthen the local economy and ensure sustainable economic growth	Should recognise that housing in locations that attract suitable workers into the borough will have a positive effect on the economy.
Reduce poverty, deprivation & social exclusion – EC3 how close is the site to key employment sites?	'Key' employment sites need to be clearly defined on a map.
Reduce the need to travel, especially by car, improve choice and the use of more sustainable modes - ACC4: How accessible is the site to the nearest train station?	This criteria is biased to areas with a railway station. It could be widened to accessibility to the nearest train station <i>or cycleway</i> , or alternatively dropped altogether.
Natural Resource – NR3 loss of high quality agricultural land	The criteria are unclear for sites of 10-20 hectares of grade 3b land.

Question 11

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

Agree.

Question 12

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

Agree.

Question 13

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

A 20-year period is appropriate *provided* it includes enough release of Green Belt land to provide sufficient land for at least 2 plan periods – ie 40 years.

This is necessary to be consistent with the National Planning Policy Framework, which states: *“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”* (NPPF paragraph 83)

The Local Plan can only be found 'sound' if it provides certainty for the long-term Green Belt boundaries, which should only be reviewed once in a generation. Consequently the Local Plan needs to release from the Green Belt sufficient land to be 'safeguarded' for future development needs up to 2057.

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?

Further to the above comment, the Preferred Option consultation draft needs to include land to be removed from the Green Belt and 'safeguarded' for future development needs beyond the plan period.