

2: Questions

Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

Northern Trust supports the approach undertaken to set new housing and employment land need for the 20-year plan period. It is essential that Warrington continues to play its full role in the wider regional economy, supporting the Northern Powerhouse.

Question 2

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

Northern Trust objects to the calculation of urban capacity and the quantity of housing forecast for delivery within the 20-year plan period.

The Warrington Local Plan considers 15,429 homes as deliverable over the 20-year plan period from the urban area as set out in the Urban Capacity Assessment Update (July 2017). Of this, 7,558 homes are considered deliverable from the City Centre/ Waterfront masterplan as set out in the masterplanning exercise provided by Warrington & Co, '*Warrington Means Business*'.

The City Centre / Waterfront Masterplan is supported by a Trajectory that sets out assumed phased delivery of zones / plots within the Masterplan over the 20-year plan period. The trajectory is provided by Warrington & Co and its agents specifically to inform and underpin the evidence in the Urban Capacity Assessment Update, given that the Masterplan has a 2040-time horizon and a rounder, 8,000 new homes target. The Masterplan itself has evolved from concept work started in 2013 under the moniker of '*Warrington Means Business*', led by Warrington & Co.

It is considered the estimated deliverable City Centre / Waterfront urban capacity is overstated in the region of 2,000 homes or 26% of the total 7,558 home figure asserted. Our view on this over-statement is informed by the following key points.

1. Over-reliance on sites in the city centre that are existing retail and commercial uses that provide significant roles in the retail offer and local economy of the Borough, and significant sources of employment in their own right.
2. Insufficient evidence of the deliverability and developability of sites to the requirement of NPPF Footnotes 11 & 12 to the outline phasing and trajectory asserted within the plan period.

3. Significant proportion of the city centre masterplan sites are not identified in parallel in the 2017 SHLAA indicating that those omitted sites may not be available as a reasonable prospect in the period 0-15 years per NPPF Footnote 12.
4. No evidence of how, when or where retail and commercial businesses required to close will relocate to, and the effects on significant numbers of jobs in the local economy.
5. No evidence from key retailers and businesses affected that they support the masterplan and the trajectory set out.
6. Uncertainty that key infrastructure delivery and funding to support the trajectory will be achieved and/or achieved to the timescales required to maintain the development pace.

The masterplan is acknowledged to be a vision and concept for the growth of Warrington as a new city. Northern Trust supports the Council setting an ambitious vision rather than an anaemic plan that aims low. However, a vision is not a plan. The final shape and balance of the city centre will not be dictated to by the masterplan or its trajectory, instead it will evolve informed by the vision and the masterplan. In this sense the importance of the vision is to set a goal. The importance of the plan is to give space and time to effect the vision with some short-term deliverable sites for the plan period (0-5 years) that can be evidenced in line with expectation of NPPF Footnote 11. Medium and long term sites (5-10, 10-15 and 15-20 years) must then be deliverable in line with NPPF Footnote 12. It is here the evidence base and the Trajectory falls significantly short.

A developable site should; *'be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.'* (NPPF Footnote 12). It is not disputed that the city centre is a suitable location for housing development, but where is the evidence of reasonable prospect of availability? And evidence of reasonable prospect of viability at the point envisaged in the trajectory for development? Both critical elements are absent in the evidence base presently.

The Masterplan requires the complete loss of all existing supermarkets in the town centre, including ASDA, Sainsbury's, Lidl and Aldi, alongside the two main retail parks at Cockhedge and Riverside. The Masterplan assumes no replacement retail units of a scale suitable for relocation for larger formats. This inevitably will lead to a significant loss of representation of major retailers in the town centre, potentially to less sequentially preferable sites and to the detriment of vitality and viability.

All redevelopment of existing businesses and retailers will require significant lead-in times. Delays will arise in identifying, purchasing, securing permission and construction of new premises to enable relocation. Delays then ensue from decommissioning, demolition, construction of new development under the masterplan. These delays may be supplemented by other legal issues, not least the difficulties arising to surrender or rundown multiple leases in the two retail parks, and then need acquire multiple land interests to deliver the Masterplan.

There is no evidence on any analysis of impact on local employment of the proposed changes to trading locations and practice of multiple businesses. There is no public support from significant players in the local economy, not least Unilever, ASDA (as operator of a superstore and distribution depot), Sainsbury's or the two retail park owners.

Not only is the breadth of businesses affected and the employment this currently provides in the city centre of significant concern, but to attain the trajectory of housing delivery the lead-in for site

acquisition, clearance and development will mean some key businesses closing and/or relocating within the short-term, i.e. a 0-5-year or 5-10-year timeframe.

The SHLAA 2017 excludes most of the key sites in the Masterplan as development opportunities in the next 0-15 years, i.e. retailers and businesses from identified available sites. This sits uncomfortably, and in case diametrically opposed, with the Masterplan as corroborating evidence on deliverability and developability as required by NPPF Footnotes 11 and 12.

Viable delivery of the housing within the masterplan is not just as simple as capacity on a plan and a trajectory. Multiple blocks for housing (or mixed use with housing) sit alongside assumed redeveloped commercial areas to provide the new urban setting. One cannot necessarily assume the homes could be delivered in isolation, particularly as viability is untested in the evidence as required by NPPF Footnote 12, because viability will be strongly influenced by the progress of the masterplan and its assumptions.

Several phased delivery areas in Zones A, B, C, D and E for years 0-5 and 6-10 for housing must sit alongside existing retailers, delivery yards, existing highway and other bad neighbour uses until redeveloped in years 11-16. One or two developments may achieve a planning balance and delivery in isolation, but the quantum is too great in scale in too short a time period to make this a realistic assumption. This sets aside the relatively new apartment market in Warrington that is untested at the scale required to be attained in the masterplan, at delivery rates more akin to the mature market in Manchester or Liverpool. Once more, there is no lack of ambition, but there is a lack of robust evidence required for plan-making.

Without more detailed evidence, presented in a coherent manner, rather than across separate documents, it is difficult to dissect further the masterplan assumptions. This evidence should be provided for the next stage for further comment.

Based on what is available it is our view that there is sufficient uncertainty over around 2,000 homes or 26% of the 7,558 asserted delivery in the plan period. This is based on simply focusing on the impact on ASDA, Sainsbury's, the two retail parks and Unilever sites. The implication is that the estimate for urban capacity for the plan period falls to around 13,500 homes, before any analysis of other urban capacity.

Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

No.

The use of the OAN figure and adjustment for the 5% flexibility in housing allocations, and 5 year over-allocation in employment land is accepted as reasonable.

The objection relates to the 36% Green Belt land assumption for housing in the subsequent plan period by rolling forward the assumption in this plan period. This presupposes the percentage is

correct in this plan period, which we do not consider it is (see responses to Q2 and Q8), and ought to be higher, for two separate reasons.

First reason is the 36% calculation in the Council's preferred approach is wrong. The 36% is calculated by 8,791 homes in Green Belt out of 24,220 homes (Table 1). However, the 24,220 includes a backlog of 847 homes. The actual plan requirement is 22,260 homes meaning Green Belt release is 39% of the requirement. As this Plan will deal with the backlog, and there is no rollover of a backlog post-2037, the Council is using the wrong approach and percentage calculation. Consistent to its own approach the percentage ought to be 39% and 149 ha Safeguarded Land requirement in Table 3.

The second reason is unrelated to the first, and may or may not lead to a similar 39% outcome. This approach is our preferred approach over the Council's, even as corrected above.

Defining Safeguarded Land allocation in a subsequent plan is derived from the needs of the current plan. If this current plan overestimates delivery of homes from this plan period, then the amount of Green Belt land is underestimated for release because the second is a function of the first (see Table 1). We set out elsewhere our view why urban capacity delivery is overestimated, specifically in the region of 2000 homes from the city centre (see responses to Q2 & Q8). Applied to Table 1, we consider that Green Belt housing release is needed in the region of 10,591 homes, or 47.5% (of 22,260 homes requirement before backlog).

Applied to Safeguarded Land this would increase the allocation to around 181 ha in the next plan (applied to Table 3).

There is an acknowledged circular argument in this. Less urban capacity delivery by 2037 will theoretically increase available urban capacity in the next plan period that may reduce the need for Safeguarded Land. It is theoretical because we consider several of the sites in the urban capacity as simply unavailable now and in any reasonable prospect in the future. What this reinforces is our position that the Plan is insufficiently robust or flexible in release of Green Belt land now because of overestimation and over-reliance on urban sites, and equally more Safeguarded Land should be released to prevent a recurrence of review and revisiting of Green Belt boundaries in the next Plan, contrary to NPPF paragraph 85, bullet 5.

It is our submission Safeguarded Land should comprise at least 39% or 149 ha on the Council's own approach, and ought to be closer to 47.5% or 181 ha if realistic assumptions on delivery of urban capacity in this plan period are adopted.

Question 4

Do you agree with the new Local Plan Objectives?

Northern Trust has no objection to the identified Local Plan Strategic Objectives (Table 5) or the Assessment Criteria (Table 6).

However, there is one qualification that the evidence of the Warrington Means Business Regeneration programme (paragraph 4.37, bullet 1), is objected to on the specific basis of the identified, deliverable urban capacity from the city centre in the plan period. The emphasis is given because there is no objection to setting out a bold vision, led by a masterplan, as we set out in response to Q2 & Q8. But, the Strategic Objectives must be justified in a realistic and robust evidence base of viable, delivery. And, it is on this area there is strong objection to the assumptions on urban capacity delivery that has far reaching consequences for setting of parameters for greenfield and Green Belt land release to meet the totality of the Plan needs for housing.

Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

Northern Trust agrees with the broad spatial Option 2 for development of Warrington, but objects to insufficient attention being brought to the sustainable development opportunities presented in the outlying settlements; specifically, Burtonwood.

At Table 7 Option 2 identifies that; *'... incremental growth in the outlying settlements could contribute to longer term sustainability of local services and local business, promote local housing choice and deliver a number of smaller sites in the early part of the plan period.'*

For reasons set out in response to Q13 and the Vision Document that supports this representation, it is considered that a greater scale of development in the region of 250-300 units is required at Burtonwood. This will ensure attainment of sustainable development objectives. Incremental growth should not be termed solely on sustainability of the settlement, but the growth must of itself be of sufficient scale to viably deliver the plan objectives associated with the allocation, i.e. developer contributions to matters such as infrastructure, education and affordable housing.

Because of the tightly drawn Green Belt boundaries and the emphasis in previous plan reviews to focus development to the main urban area of Warrington, Burtonwood, has received very little inward investment recently. As set out in submissions on call for sites, there is an unmet need for market and affordable housing within the settlement to redress, that will itself assist the longer-term sustainability of the settlement. A larger allocation in the region of 250-300 units will better serve these longer-term needs.

An increase in allocation to Burtonwood as an outlying settlement, will be in line with Spatial Option 2, and would help redress identified uncertainty in delivery from the city centre, (see our response to Q2 & Q8).

Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

Northern Trust objects to the identification of the incremental growth at outlying settlements, set out at Stage 4 in the Preferred Development Options, and the supporting evidence of the documents *Area Profiles and Options Assessments – Technical Note*, July 2017 and *Settlement Profiles - Outlying Settlements*, July 2017.

The central issue is the three growth options assessed in the *Settlement Profiles* do not take into consideration viability / delivery. Each outlying settlement has a different level of growth for (1) incremental growth, (2) sustainable settlement extension and (3) major settlement extension. The figure is different to each settlement, based upon the methodology set out in the *Technical Note*. It is this part of the evidence base we consider inadequate and poorly conceived as an evidence base to the Preferred Option.

Technical Note paragraph 1.10 states;

'For the outlying settlements, the Council applied the following assumptions in defining the growth scenarios:

(i) 'Incremental growth' - based on a level of development that could be accommodated by existing infrastructure, subject to minor expansion of that infrastructure, up to 10% of settlement size.'

Paragraph 1.11 states;

'The 10% limit in relation to settlement size is to ensure development is being capable of being accommodated without changing the character of the respective settlement under the 'incremental growth' scenario. There is no fixed percentage for the 'sustainable settlement extension' scenario. There is an acceptance that this scenario will impact on character, but the impact should not be of a scale which would fundamentally change the character of the settlement.'

The 10% limit is not based on a settlement analysis of impact on character, but is a mathematically driven upper limit to apply to all outlying settlements in absence of a settlement character analysis. It is an assumed upper limit that can be accommodated within existing infrastructure or with only minor expansion, but again it is not based on any settlement analysis of that infrastructure capacity. This is despite that there are only 7 assessed settlements and it would be feasible to make an assessment that was evidenced on a character and infrastructure analysis.

A 'minor expansion of infrastructure' is also perpetuating past under-investment in outlying settlements in previous plans. Burtonwood, as example, is tightly bound by Green Belt and has seen almost no significant inward investment for several decades. There must be a case to allow more than simply 'minor expansion' if this will lead to a viable and sustainable level of investment to support the needs of the settlement, and to redress past under-investment.

The 10% limit does not take into any consideration whether the figure derived is a viable development option. As we set out in response to Q13 and the appended Vision Document, 150 homes at Burtonwood will not prove viable, with usual developer contributions, including affordable housing and open space, alongside specific support for primary school expansion and primary care facilities (PDO paragraph 5.47). It is Northern Trust's view that a viable scale of development will be in the region of 250-300 homes.

In response to Q5 the lack of past investment at Burtonwood due to an urban centric development focus in previous plan was referred to. That there is some degree of investment planned now is supported, but the comparative scale and ambition shown to the urban area / city centre and the major extensions to the southwest and Garden Suburb, is not matched by an ambition proportionate to secure genuine, sustainable development at outlying settlements to redress needs built-up over years of lack of investment. The 150 unit / 10% limit is in danger of perpetuating a relative lack of investment, even if in absolute terms there is a nominal 1,000 homes allocated over the 7 settlements.

The second settlement extension scenario (2) for Burtonwood assumes 700 homes is delivered. *Technical Note* paragraph 1.10, bullet 2, states this scenario is based on, 'a new or expanded primary school, taking into account available sites.' Yet, we know at PDO paragraph 5.47 that the Council will require primary school expansion and primary care facilities on just 150 homes (PDO, Table 22). This only reinforces Northern Trust's position that 150 units is too low to deliver the expanded infrastructure.

It is Northern Trust's view that the conclusion that the outlying settlements can provide a combined total of 1,000 units is unjustified and unsound on the evidence base. This figure is not based on a sound and robust assessment of delivering sustainable development to the outlying settlements. There is a need at Burtonwood specifically, and to other outlying settlements generally, to redress lack of past investment to truly deliver sustainable growth.

Question 7

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

Northern Trust gives qualified support to the overall objective of the Preferred Development Option, Option 2.

The qualified overall support to Option 2 is tempered by our criticisms to the methodology to assess growth options to outlying settlements (response to Q6) and identified deliverable supply from urban capacity (response to Q2 & Q8). It is our view that Option 2 is not incompatible with increasing the scale of housing at outlying settlements, because this is driven by firstly, providing a sustainable scale of development at settlements such as Burtonwood; and, secondly, that the urban capacity is overstated in delivery in the plan period.

Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

As set out in response to Q2, Northern Trust has specific objection to the identified, deliverable capacity of the city centre Masterplan. The response here carries through those same objections.

Capacity is overstated in the city centre Masterplan because of the following key points:

1. Over-reliance on sites in the city centre that are existing retail and commercial uses that provide significant roles in the retail offer and local economy of the Borough, and significant sources of employment in their own right.
2. Insufficient evidence of the deliverability and developability of sites to the requirement of NPPF Footnotes 11 & 12 to the outline phasing and trajectory asserted within the plan period.
3. Significant proportion of the city centre masterplan sites are not identified in parallel in the 2017 SHLAA indicating that those omitted sites may not be available as a reasonable prospect in the period 0-15 years per NPPF Footnote 12.
4. No evidence of how, when or where retail and commercial businesses required to close will relocate to, and the effects on significant numbers of jobs in the local economy.
5. No evidence from key retailers and businesses affected that they support the masterplan and the trajectory set out.
6. Uncertainty that key infrastructure delivery and funding to support the trajectory will be achieved and/or achieved to the timescales required to maintain the development pace.

A developable site should; *'be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.'* (NPPF Footnote 12). It is not disputed that the city centre is a suitable location for housing development, but where is the evidence of reasonable prospect of availability? And evidence of reasonable prospect of viability at the point envisaged in the trajectory for development? Both critical elements are absent in the evidence base presently.

The Masterplan requires the complete loss of all existing supermarkets in the town centre, including ASDA, Sainsbury's, Lidl and Aldi, alongside the two main retail parks at Cockhedge and Riverside. The Masterplan assumes no replacement retail units of a scale suitable for relocation for larger formats. This inevitably will lead to a significant loss of representation of major retailers in the town centre, potentially to less sequentially preferable sites and to the detriment of vitality and viability.

All redevelopment of existing businesses and retailers will require significant lead-in times. Delays will arise in identifying, purchasing, securing permission and construction of new premises to enable relocation. Delays then ensue from decommissioning, demolition, construction of new development under the masterplan. These delays may be supplemented by other legal issues, not least the difficulties arising to surrender or rundown multiple leases in the two retail parks, and then need acquire multiple land interests to deliver the Masterplan.

There is no evidence on any analysis of impact on local employment of the proposed changes to trading locations and practice of multiple businesses. There is no public support from significant players in the local economy, not least Unilever, ASDA (as operator of a superstore and distribution depot), Sainsbury's or the two retail park owners.

Not only is the breadth of businesses affected and the employment this currently provides in the city centre of significant concern, but to attain the trajectory of housing delivery the lead-in for site acquisition, clearance and development will mean some key businesses closing and/or relocating within the short-term, i.e. a 0-5-year or 5-10-year timeframe.

The SHLAA 2017 excludes most of the key sites in the Masterplan as development opportunities in the next 0-15 years, i.e. retailers and businesses from identified available sites. This sits uncomfortably, and in case diametrically opposed, with the Masterplan as corroborating evidence on deliverability and developability as required by NPPF Footnotes 11 and 12.

Viable delivery of the housing within the masterplan is not just as simple as capacity on a plan and a trajectory. Multiple blocks for housing (or mixed use with housing) sit alongside assumed redeveloped commercial areas to provide the new urban setting. One cannot necessarily assume the homes could be delivered in isolation, particularly as viability is untested in the evidence as required by NPPF Footnote 12, because viability will be strongly influenced by the progress of the masterplan and its assumptions.

Several phased delivery areas in Zones A, B, C, D and E for years 0-5 and 6-10 for housing must sit alongside existing retailers, delivery yards, existing highway and other bad neighbour uses until redeveloped in years 11-16. One or two developments may achieve a planning balance and delivery in isolation, but the quantum is too great in scale in too short a time period to make this a realistic assumption. This sets aside the relatively new apartment market in Warrington that is untested at the scale required to be attained in the masterplan, at delivery rates more akin to the mature market in Manchester or Liverpool. Once more, there is no lack of ambition, but there is a lack of robust evidence required for plan-making.

Without more detailed evidence, presented in a coherent manner, rather than across separate documents, it is difficult to dissect further the masterplan assumptions. This evidence should be provided for the next stage for further comment.

Based on what is available it is our view that there is sufficient uncertainty over around 2,000 homes or 26% of the 7,558 asserted delivery in the plan period. This is based on simply focusing on the impact on ASDA, Sainsbury's, the two retail parks and Unilever sites. The implication is that the estimate for urban capacity for the plan period falls to around 13,500 homes, before any analysis of other urban capacity.

Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

Northern Trust has no comment to make on the Wider Urban Area at this time.

Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

Northern Trust has made comment on the Waterfront delivery in connection with the City Centre Masterplan under Q8.

Question 11

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

Northern Trust has no comment to make on the Garden City Suburb at this time.

Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

Northern Trust has no comment to make on the South Western Urban Extension at this time.

Question 13

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

Northern Trust supports identification of development opportunities for housing, and some associated infrastructure, to the outlying settlements as part of Option 2, including Burtonwood. But, objects to the limited scale of opportunity identified at Burtonwood that fails to capture the available sustainable development opportunity presented specifically by Northern Trust's land at Phipps Lane / Green Lane within GBA Site BW3. And, objects to the allocation of only 150 units as a scale too limited to viably deliver the housing and usual associated infrastructure, alongside usual developer contributions for affordable housing and open space; and, specific support for expansion of primary school facilities and primary care.

In support of allocation of Northern Trust's land at Burtonwood we provide a Vision Document that in summary:

- Sets out the context, site opportunities and constraints of Northern Trust's Site at Phipps Lane / Green Lane within GBA Site BW3;
- Demonstrates the Site is sequentially preferable over other proposed development sites at Burtonwood on a range of sustainable development objectives and the position of the Site related to existing infrastructure and facilities, and its ability to enhance connectivity;
- Provides an Illustrative Masterplan to demonstrate the developability and deliverability of the Site; and,
- Demonstrates through the Illustrative Masterplan the ability to deliver longer-term development needs, potentially beyond the present plan-period through allocation of Safeguarded Land.

The Vision Document also supports separate response to Q2 and Q8 and the need to identify more housing capacity at outlying settlements, including Burtonwood. Through the Illustrative Masterplan it is demonstrated that the Council's preferred 150 units can be accommodated on the Site alongside supporting infrastructure, notwithstanding such a level of provision may not deliver all the developer contributions currently assumed in the PDO (paragraph 5.47) and usual policy requirements. It is also demonstrated that in principle the Site can accommodate a scale of development of 250-300 units considered both more reasonable to accommodate shortfall from city centre urban capacity (see response to Q2 & Q8), and to deliver a viable development that supports all sought developer contributions.

PDO paragraphs 5.49 & 5.50 set out the Council will continue work on settlement site capacity and detailed site capacity work. Northern Trust looks forward to positive engagement with the Council as a key landowner at Burtonwood to take forward the Plan to the next stage to allocate and safeguard land.

Question 14

Do you agree with our approach to providing new employment land?

Northern Trust has no comment on the approach to provision of new employment land at this stage.

Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

Northern Trust has no comment

Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

Northern Trust has no comment

Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

The Preferred Development Option is currently light or absent on some key policies areas, such as affordable housing needs and retail planning policies. It is noted that this will be taken forward at subsequent stages, but as set out in response to Q2 & Q8, the lack of any retail assessment and update has provided a gap in evidence on the potential impact of assumed redevelopment of key retail players in the city centre, including ASDA, Sainsbury's, Cockhedge Retail Park and Riverside Retail Park.