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**WARRINGTON**  
Borough Council

# **Warrington Borough Council**

## **Local Plan**

***Preferred Development Option***

**Regulation 18 Consultation**

**Standard Response Form**

**July 2017**

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## 1: Contact Details (Compulsory)

Title: [REDACTED]

First Name: [REDACTED]

Last Name: [REDACTED]

Organisation (if applicable): Slab Promotions Ltd.

Address:

C/O Agent

DPP Planning, Barnett House, 53 Fountain Street, Manchester, M2 2AN

Phone Number: [REDACTED]

E-mail: [REDACTED]

**Which best describes you?** (tick ✓ one option only)

Resident in Warrington

Resident from outside of Warrington

Business

Other, please specify

## 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?**

### **Response:**

None, other than to reiterate comments made in previous representations that the overall requirement for both new housing and employment should include a generous buffer so as to ensure that annual and the plan period targets are met, which hasn't been the case in previous years and with earlier plans.

## **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?**

### **Response:**

Although the Representor does not wish to comment directly about how the Council has formulated the emerging Local Plan's housing requirement, which is based on inter alia an OAN, it is of the view that too high a proportion of the overall requirement for both residential and employment is directed towards the town's existing built up areas. The effect of this in some instances will be urban cramming and congestion as the plan does not appear to recommend the need for new infrastructure to cope with increased population, traffic and related needs. A better solution would be to direct greater levels of new development to peripheral areas where it is usually easier and viable to deliver new infrastructure and the effects of development is more dissipated.

### **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'?**

#### **Response:**

The Representor is concerned that insufficient land is proposed to be released from Green Belt to allow it to be either reallocated for development or as land safeguarded for development in future years. Although a number of areas of Green Belt are proposed to be deallocated, the Representor is concerned that the approach being followed is piecemeal and cautious when compared to the best approach, by which he means that larger, more strategic releases in well serviced and accessed key locations would deliver more in planning and sustainability terms. For example, although land in the Winwick area is planned to be released from Green Belt, in the Representor's view, a wider, more strategic release could be supported given what it would deliver and because it would not impact seriously on the purpose of Green Belt or its value and role in a local sense.

## **Question 4**

**Do you agree with the new Local Plan Objectives?**

### **Response:**

The new Local Plan objectives broadly reflect related advice and guidance falling out of NPPF, albeit adapted to suit local needs and key objectives. As such, the Representor is broadly happy with the new Local Plan Objectives.

## Question 5

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

### **Response:**

The Preferred Development Option document has highlighted 'Option 2 - Majority of Green Belt release adjacent to main urban area with incremental growth in outlying settlements' as the preferred spatial distribution of new development.

The Representor broadly agrees with this spatial distribution and agrees that it would enable Warrington to meet its development needs whilst directly contributing to the delivery of Warrington New City. While it is accepted that much of the Green Belt release will be centred around the main urban area of Warrington, the Representor stresses the importance of the additional incremental growth in the outlying settlements and its role in supporting local services and widening local housing choice without compromising their character. This approach to Green Belt release is of particular relevance to the Representor's sites North and South of Townfield Road as these sites are part of the outlying settlement of Winwick and the release of such sites from the Green Belt would contribute to the Council's aim to deliver a number of smaller sites in outlying settlements in the early part of the plan period.



## Question 6

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

### **Response:**

The Preferred Development Option document has highlighted 'Option 2 - A Garden City Suburb of approximately 6,000 homes & an urban extension to the south west of Warrington of up to 2,000 homes' as the preferred main development locations.

While the representor understands that meeting the borough's housing needs will require the designation and development of larger, strategic sites such as these, attention should be given to the pressures this will put upon infrastructure and transport.

The Preferred Development Option states that a large number of sites were put forward in the call for sites exercise in proximity to each of the outlying settlements, far exceeding the level of growth required under the preferred spatial option. While it is acknowledged that not all of the sites put forward in the exercise will have been suitable or sustainable for housing development, the high number of potential sites in outlying settlements warrants a reconsideration of the proportion of housing to be delivered in the main strategic development locations (Garden city suburb and urban extension), in relation to the outlying settlements. A reduction in the level of housing delivery in the main development locations could reduce the level of lengthy and costly infrastructure provision required and provide a more balanced spatial distribution of development. It would also allow for a higher level of development within the outlying settlements, which would support local services, widen local housing choice and contribute to the Council's aim to deliver of a number of smaller sites in outlying settlements in the early part of the plan period, while also ensuring that Green Belt is released in a sensible and sustainable manner.

## Question 7

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

### **Response:**

The Preferred Development Option for meeting Warrington's future development needs identifies four main areas of growth – The City Centre, the Waterfront, the Garden City Suburb and the South West Urban Extension. These areas are complemented by the optimisation of development throughout the remaining neighbourhoods of the main urban area and incremental growth in Warrington's outlying settlements.

The development trajectory proposes that 1,190 homes will be delivered in the outlying settlements (Green Belt) to be delivered in the early stages of a 20-year period. The Representor believes that this is a conservative projection and emphasises the need for sufficient suitable sites in outlying settlements, such as the Representor's sites, to be released from the Green Belt, alongside larger strategic sites, to allow progress to be made in delivering housing in the early stages of the plan period, particularly as the likes of the Garden City Suburb and South West Urban Extension will not realistically be delivered until the later stages of the 20-year period.

## **Question 8**

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

### **Response:**

Although this matter is not overly relevant to the key matters the Representor's main representations, he is of the view that seeking to ensure that the Town Centre is as vital, viable and sustainable as it can be, is an important and necessary objective for the emerging Local Plan. This is because securing a vital and viable Town Centre will contribute significantly towards overall plan objectives and through this the creation of a truly sustainable settlement. As such, any proposals for the Town Centre should have regard to this and, linked to this point, be realistic and deliverable. The points about need for realism and deliverability are based on concerns around overly ambitious plans which do not have regard to national and regional trends in retailing and the local market and are unlikely to be achieved.

## **Question 9**

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

### **Response:**

Our response on this question reflect points already made in the context of earlier questions, i.e. that too much development is proposed to be directed towards existing urban areas, whereas there are planning benefits to be enjoyed by directing a greater proportion towards peripheral/greenfield locations, especially those well located/accessible and served by infrastructure.

## Question 10

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

### Response:

No.

## **Question 11**

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

### **Response:**

None, other than to say as already inferred through responses to earlier questions, the area to the north of the town/M62 provides scope for a similar development.

## **Question 12**

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

### **Response:**

Response same as for question 11.

## Question 13

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

### **Response:**

The Preferred Development Option defines an approximate number of homes the Council considers can be accommodated by each of the outlying settlements under the 'incremental growth' scenario. Here, an indicative figure of 90 homes has been allocated to Winwick.

The Representor appreciates that this figure is only indicative and that the final numbers will depend on the detailed assessment of potential development sites and the impacts on the character of settlements, the permanence of the Green Belt and transport impacts. However, the Representor believes that the actual figures for growth in the Green Belt in Winwick are likely to be significantly greater than projected, especially given the ambitious targets for residential brownfield development centred around the main urban area. As such, there may be a requirement for more release of Green Belt land in Winwick than anticipated, for which the Representor's site would represent a suitable option to contribute to the delivery of new housing in Winwick.



## Question 14

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

### **Response:**

The Preferred Development Option sets out Warrington's need for employment land over the next 20 years, of which 130ha of supply will be in the existing urban area and 251ha will be in the Green Belt.

The Representor broadly agrees with Warrington Council's intention to plan for an ambitious level of economic growth in accordance with the LEP's Strategic Economic Plan, as well as the proposed release of Green Belt land to provide 251ha of employment land. The preferred option outlined by the Council is for employment development on land to be released from Green Belt to be directed towards the Warrington Waterfront area and the land at the M56 Junction 9, sites, which will meet the majority of Warrington's employment land requirement. While the Representor broadly supports the use of such sites for employment, smaller sites will also need to be brought forward in addition to these larger strategic sites to provide for the remaining employment land. Though generally the residential/semi-rural character of outlying settlements is not conducive to employment uses, the Representor's sites, while not falling within specified areas for employment growth, are located along the A49 corridor where policy IW1 of the Core Strategy supports proposals for appropriate uses, principally research and development, light industrial, general industrial and storage /distribution uses (Use Classes B1(b), B1(c), B2 and B8). Such uses on these sites could contribute to the additional floorspace needed to meet Warrington's employment growth aspirations and would be broadly in-keeping with surrounding land uses, including the substantial healthcare facility to the east of site A and south of site B, the B&Q store to the west and the nearby Winwick Quay business park.

## Question 15

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

### Response:

No comments to make.

## **Question 16**

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

### **Response:**

No comments to make.

## **Question 17**

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

### **Response:**

No comments to make.

**DPP Planning**

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Sent via email: ldf@warrington.gov.uk

Date: 25<sup>th</sup> September 2017

Dear Sir or Madam,

**Consultation on Local Plan Preferred Development Option**

We write in connection with the current stage in the preparation of the new Warrington Local Plan – the Local Plan Preferred Development Option, specifically to make representations on behalf of our client; [REDACTED] [REDACTED] in relation to land north and south of Townfield Lane, Winwick, Warrington, WA2, 8TE. The sites were also submitted as part of the earlier call for sites exercise. The land south of Townfield Lane is labelled R18/046 and the land north of Townfield Lane R18/045.

The site south of Townfield Lane was historically agricultural land but has been used for regular car boot sales for many years. There are no buildings on the site but it continues to be used for car boot sales on Sundays and bank holiday Mondays. The site north of Townfield Lane is currently occupied by 3 single-storey buildings which are vacant and currently has a temporary use for car-parking/recreational uses.

These representations concern a number of topics outlined within the Preferred Development Option, with reference to national policy, particularly regarding the release of Green Belt land and the delivery of housing and employment sites. They also highlight the potential of the Representor's sites north and south of Townfield Lane to be redeveloped for residential or employment purposes, contributing to the delivery of much-needed housing and employment sites in the borough, in line with the targets proposed in the Preferred Development Option Paper.

I would be grateful if you would confirm that this letter of representations and accompanying representations in the standard response format were received by the Council before the deadline.

## Green Belt

With regard to Green Belt, the Representor notes that, at the heart of the NPPF is a presumption in favour of sustainable development. This should be seen as a golden thread running through both plan-making and decision-taking. For plan-making, this means that local planning authorities should positively seek opportunities to meet the development needs of their area; and local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This is unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in NPPF as a whole.

Further advice (para 83) in NPPF specifies that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their local plans which set the framework for Green Belt and settlement policy. 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.

Further advice (para 84) goes on to specify that when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages insets within the Green Belt or towards locations beyond the outer Green Belt boundary.

Further guidance in NPPF confirms that Green Belt serves five purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In January 2016, Warrington Borough Council appointed Arup to undertake a Green Belt Assessment with the aim to provide the Council with an objective, evidence-based assessment of how Warrington's Green Belt contributes to the five purposes of the Green Belt set out in NPPF. This assessment designated the parcel of land in which the Representor's two sites lie (WR6) as delivering a moderate contribution to purposes of the Green Belt. However, this assessment refers to a larger parcel of land of which the sites in question represent just a small proportion. It can be argued that these sites alone do not contribute to the purposes of the Green Belt. The sites do not contribute to restricting urban sprawl, the development of the sites would not result in the merging of Newton-le-Willows and the Warrington urban area and the location of the sites in the south west of the parcel means that the M62 and A49 act as effective barriers to prevent encroachment. The sites are not within 250m of any of the Town Centre Conservation Areas and they do not cross an important viewpoint of the Parish Church. While it is understood that brownfield development and the recycling of derelict and other urban land is preferred, in line with NPPF, it is evident that there is insufficient brownfield land in the borough to fully meet housing and employment needs, therefore it can be argued that parts of the Green Belt are no longer meeting their purpose to assist in urban regeneration, as such a purpose has been exhausted.

The representor agrees with the Council's conclusions that if Warrington is to meet the development needs arising from its growth aspirations, it can only do so through the substantial release of Green Belt land to provide for 8,791 homes and 251 ha of employment land. In line with national policy, it should be ensured that such releases occur in appropriate places and contribute to sustainable patterns of development.

The preferred option outlined by the Council is for the majority of Green Belt release to be adjacent to the main urban area with incremental growth in outlying settlements. The Representor broadly supports this preferred option and

agrees that it would enable Warrington to meet its development needs whilst directly contributing to the delivery of Warrington New City. While it is accepted that much of the Green Belt release will be centred around the main urban area of Warrington, the Representor stresses the importance of the additional incremental growth in the outlying settlements and its role in supporting local services and widen local housing choice without compromising their character. This approach to Green Belt release is of particular relevance to the sites North and South of Townfield Road as these sites are part of the outlying settlement of Winwick and the release of such sites from the Green Belt would contribute to the Council's aim to deliver of a number of smaller sites in outlying settlements in the early part of the plan period.

## Housing

When preparing a Local Plan, there is a need for consistency with planning policy at various levels, particularly National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). In such national guidance, the government places a considerable amount of importance on Local Plans delivering sites for development of housing. Indeed, it confirms that planning, as a process, should considerably boost the supply of housing in England.

As is reflected in the Preferred Development Options document, NPPF states that in order to significantly boost the housing supply, local planning authorities should, inter alia, use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies in the NPPF. This includes identifying key sites which are critical to the delivery of the housing strategy over the plan period. We see this as a critical requirement of a development plan that is sound, and sites that are identified for delivery of the housing strategy should be capable of being delivered within the plan period. Sites should be located and have physical properties that make them capable of being developed for housing and that this should be supported by landowners, i.e. they should be willing participants in the process.

In addition to NPPF, the Housing White Paper: Fixing our Broken Housing Market, published by DCLG in February 2017, proposes to make a series of amendments to NPPF in order to try to boost the delivery of housing in England. These proposed amendments are wide ranging but include the need for local planning authorities to have a clear strategy for maximising the use of suitable land in their area for housing development. In addition, it makes it clear that the identified housing requirement should be accommodated, unless there are other policies in the NPPF that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefit. It also indicates that great weight should be attached to the value of using suitable brownfield land within settlements for homes.

This is particularly relevant in the context of the site to the North of Townfield Lane since the site is brownfield in profile but the brownfield element sits within a larger curtilage that could be released from Green Belt, without harming the integrity of the retained areas of Green Belt in the locale.

In addition, para 12 of NPPF sets out the 12 guiding principles that should underpin the planning system. One of these is the need to encourage the effective use of previously developed land, providing such land is not of high environmental value. The Representor's site located North of Townfield Lane is currently occupied by three single-storey buildings which were previously used as a social club and for events but are of a poor design and quality, are not fit for purpose and now lie vacant. Such sites that are not contributing to economic development or housing targets provide the potential for brownfield development in the Green Belt and should be considered in the emerging Local Plan.

Also of relevance to the above is the Brownfield Land Register which was introduced through The Town and Country Planning (Brownfield Land Register) Regulations 2017 and the Town and Country Planning (Permission in Principle)

Order 2017. They brought in regulations which require local planning authorities to prepare and maintain a register of brownfield land that is suitable for residential development.

Part 1 of the brownfield register will be a comprehensive list of all brownfield sites in a local authority area that are suitable for housing, irrespective of their planning status. However, registers will also be a vehicle for granting permission in principle for suitable sites where authorities have followed the relevant procedures. If the authority considers that permission in principle should be granted for a site, the local authority can enter that site in Part 2 of their register. We would expect a site like the site North of Townfield Lane, given its brownfield status, at least in part, to be included and acknowledged as a site that is acceptable in principle for housing.

The Council have proposed the release of Green Belt land to provide for 8,791 new homes in the borough. Within the 20-year plan period, 1,190 homes are projected to be delivered in Outlying Settlements (Green Belt), of which an indicative figure of 90 homes has been allocated to Winwick, under the 'incremental growth' scenario. However, this figure is only indicative and it is understood that the targets for residential brownfield development centred around Warrington town centre are somewhat ambitious, therefore the amount of housing land that will be required in the Green Belt of the outlying settlement areas is likely to be greater than projected. The release of this section of Green Belt would contribute to meeting this need. The use of the Representor's sites for residential development would contribute to the provision of new housing in Winwick and also to the longer-term sustainability of local services and local business, enabling the delivery of a number of smaller sites in outlying settlements for housing in the early part of the plan period.

### **Employment Land**

National Planning Policy Framework (NPPF) confirms the government's objective of achieving sustainable development and it highlights that the planning system has an economic role, which involves contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.

NPPF states that one of the core planning principles is to proactively drive and support sustainable economic development to deliver business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made to identify and then meet business and other development needs of an area, and respond positively to wider opportunities for growth to create jobs and prosperity. Plans should set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of business communities. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.

To help achieve economic growth, the NPPF specifies that local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century. In drawing up Local Plans, local planning authorities should: set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. They should plan positively for the location, promotion and expansion of clusters or networks of knowledge-driven, creative or high technology industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.



The Representor broadly agrees with Warrington Council's intention to plan for an ambitious level of economic growth in accordance with the LEP's Strategic Economic Plan, as well as the proposed release of Green Belt land to provide 251ha of employment land. The preferred option outlined by the Council is for employment development on land to be released from Green Belt to be directed towards the Warrington Waterfront area and the land at the M56 Junction 9, sites, which will meet the majority of Warrington's employment land requirement. While the Representor broadly supports the use of such sites for employment, smaller sites will also need to be brought forward in addition to these larger strategic sites to provide for the remaining employment land. The Representor's sites, while not falling within specified areas for employment growth, are located along the A49 corridor where policy IW1 of the Core Strategy supports proposals for appropriate uses, principally research and development, light industrial, general industrial and storage /distribution uses (Use Classes B1(b), B1(c), B2 and B8). Such uses on the sites could contribute to the additional floorspace needed to meet Warrington's employment growth aspirations and would be in keeping with surrounding land uses, including the substantial healthcare facility to the east of site A and south of site B, the B&Q store to the west and the nearby Winwick Quay business park.

The sites in question are also located in close proximity to the A49 which represents an important linkage to Warrington town centre. There are also strong public transport links including a bus stop located immediately adjacent to site A along the A49 with regular services to Warrington town centre, Vulcan Village, Leigh, St Helens and Wigan. It is also conveniently located close to junction 9 of the M62, providing easy access to the wider strategic road network. This location is beneficial for accessibility for residential, employment or leisure use and could also support a potential use as roadside services.

## Summary

Drawing upon national policy and guidance in NPPF and the Housing White Paper, these representations address a number of key topics within the Preferred Development Options paper.

An important point to emphasise in the preparation of the new Local Plan is the necessity of the release of Green Belt in Warrington to meet housing and employment needs and the need for such releases to be in appropriate places in which development will be sustainable and the permanence of the Green Belt will be maintained at a strategic level.

Another key aim of the Council, which the Representor supports, is the encouragement of the effective use of brownfield land, which the Representor's site North of Townfield Lane is classified as. The development of this brownfield site within the Green Belt for housing would offer a higher quality land use and allow for incremental growth within the settlement of Winwick, in line with the Council's preferred option on Green Belt release. Alternatively, the release of a wider area of Green Belt in the locality, including the undeveloped site South of Townfield Lane, could offer a suitable, accessible site for more strategic residential development, offering a greater contribution to housing targets, particularly those for Winwick, which are likely to exceed their indicative figures in later assessment stages.

Alternatively, the Representor's sites may be suitable to meet employment needs in the borough, as they could offer the additional required employment land that is not deliverable on the main preferred areas of Warrington Waterfront and the land at the M56 Junction 9. They also sit amongst various land uses, including nearby buildings of substantial scale, meaning that development for employment uses would be in-keeping with the scale and design of the surrounding area. The sites may also be considered for the provision of roadside services due to their strategic location close to junction 9 of the M62. These sites are considered strategically sustainable and it is not considered that they contribute to the purposes of the Green Belt, nor would their redevelopment, for any of the uses discussed, threaten the openness and permanence of the Green Belt.

As requested earlier, in the first instance, I would be grateful if you could confirm receipt of this letter and the representations it sets out on behalf of the Representor.

Thank you.

Yours sincerely,

