

Land off Smithy Brow, Croft

Warrington Local Plan Review

Preferred Development Option : Regulation 18 Consultation

Iceni Projects on behalf of Wallace Land

September 2017



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EXECUTIVE SUMMARY

These representations are made to the Local Plan Preferred Option consultation on behalf of Wallace Land Investments (Wallace) and concern the promotion of a 2.9ha (7.3 acres) site in Croft, hereon in referred to as Land off Smithy Brow, Croft. The site can accommodate up to approximately 90 new homes, (30% of which to be affordable), informal and formal public open space, locally equipped areas of play, and a retail/convenience store.

Wallace supports the Council's aspirations for growth and the comprehensive approach to meeting Warrington's development needs, which provide the basis for the 'exceptional circumstances' that the National Planning Policy Framework (NPPF) requires to be demonstrated to support the release of Green Belt land.

The site represents a suitable, sustainable, and deliverable option to accommodate growth identified for Croft as part of the incremental growth scenario within the Preferred Development Option. Wallace broadly supports Warrington Borough Council's (WBC) Preferred Development Option, however, raise several concerns which should be addressed as part of the Local Plan Review process. The site and development proposals directly respond to its local context, and in a broader sense to the issues raised in these representations, namely, they can be summarised as:

- It has not been properly evidenced or justified that the outlying settlements cannot accommodate further growth than that proposed, and these sites are likely to be of a scale that could deliver much needed market and affordable homes within the early years of the plan period and beyond;
- The 'anticipated' figure of 60 new homes for Croft only represents 10% growth for the settlement. Affordability issues in Croft will not be addressed without additional homes beyond the current figure suggested;
- Wallace welcome the Council to allocate sites for the outlying settlements within the Local Plan to ensure certainty in the delivery of new homes;
- The Preferred Options do not recognise the importance of the outlying settlements as a key part of realising the Council's ambition to realise Warrington as a New City;
- In the context that the Preferred Development Option accommodates development solely within 4 large growth areas, the plan requires additional flexibility to adapt to change and a 20% buffer should be included within the housing requirement to ensure the plan delivers at least the minimum requirement within the plan period;
- Assumptions used by the Council to calculate gross to net developable areas is questioned and does not take account of the size of each growth area which could see net developable areas as low as 55%;
- There is a clear need for additional Green Belt land to be allocated and released to ensure the plan is flexible and can adapt to changing circumstances;
- The method in calculating the safeguarding land requirement is questioned, and its subsequent spatial distribution is over simplistic and contradictory, and if undertaken appropriately, then it is clear further Green Belt land will be required for safeguarding for development beyond the plan period;
- Lead in times, anticipated start dates, and sustained delivery rates for development, are overly optimistic, and do not take account of some of the significant infrastructure required, or known circumstances that will inhibit delivery; and
- Further work and justification is needed to understand the delivery, funding, and location of social, environmental, and physical infrastructure especially in the case of the Garden Suburb Proposal.



1. INTRODUCTION

- 1.1. These representations are submitted in response to the Warrington Borough Council Preferred Options consultation (September 2017) of the Warrington Borough Local Plan Review. They have been prepared on behalf of Wallace.
- 1.2. Wallace promote residential and mixed-use development in partnership with landowners across England and Scotland, and are experts in their subsequent delivery.
- 1.3. The Local Plan Core Strategy sets out the planning framework for guiding the location and level of development in the borough up to 2027. The adopted Plan was the subject of a High Court legal challenge and the council has now begun the work necessary to ensure the housing elements of the Plan are revised in line with the ruling and reinstated as soon as possible.
- 1.4. Wallace is keen to continue to work with the Council and other key partners in order to ensure that the growth aspirations of Warrington are realised. These representations respond to the emerging policies and strategic matters, having regard to the national, sub-regional, and local policy context. Wallace have identified a number of elements where modifications to the Plan should be considered. The representations also provide comment in respect of the evidence base that underpins the Warrington Borough Local Plan and the development options identified.
- 1.5. They are framed in the context of the requirements of the Warrington Borough Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 182. For a Plan to be sound it must be:
- **Positively Prepared** – the plan should be prepared based on the strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its plan period and based on effective joint working on cross boundary strategic priorities; and
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 1.6. These representations also have regard to the Government’s recently published Housing White Paper – Fixing Our Housing Market (February 2017). The White Paper places emphasis that since the 1970s, there have been on average 160,000 new homes built each year in England. The consensus is that we need between 225,000 to 275,000 more homes per year to keep up with population growth before we even start to tackle years of under-supply and affordability issues.
- 1.7. The identified problem is threefold:
- not enough local authorities planning for the homes they need;
 - house building that is simply too slow; and
 - a construction industry that is too reliant on a small number of big players.
- 1.8. In order to help ensure that local authorities plan for the right homes in the right places, the Department of Communities and Local Government (DCLG) recently published the consultation document, **Planning for the Right Homes in the Right Places (14 September 2017)**. The rationale behind the consultation is to create a system that is clear and transparent to avoid complex, inconsistent, and expensive processes. In aim of this, the Government proposes a new standardised method for assessing housing need.
- 1.9. The proposed new approach aims to provide clarity and simplify the method for arriving at a robust starting point for establishing housing need i.e. Policy-off position, and it is intended a revised National Planning Policy Framework (NPPF) will be published for consultation in Spring 2018 to reflect these changes (and others).
- 1.10. The proposed streamlined method consists of three components. The starting point continues to be the demographic baseline and is based on household projections which is then adjusted to take account of affordability (average house prices to median average annual incomes). It is proposed that for every 1% the affordability ratio is above 4, housing need is increased in increments of 0.25%. To ensure the level of need generated as a response to the proposed incremental increases is deliverable and realistic, a cap of 40% is proposed on the total increase.
- 1.11. At the present time, many local authorities, including Warrington, are already working together when identifying their housing need under the duty to co-operate. The Government is proposing that local planning authorities should be able to rely on the evidence used to justify their local housing need for a period of two years from the date on which they submit their plan. Planning Inspectors are advised to work on the assumption that if an authority employs the outlined approach, they are sound to do so, unless there are compelling reasons to indicate otherwise.
- 1.12. The Government is also proposing to set a period of time to enable the transitional arrangements required before new Local Plans are expected to employ the proposed standardised method for calculating housing

need. Local authorities who submit new Local Plans to the Secretary of State (SOS) after 31st March 2018 are expected to employ the newly proposed standardised method. As the review of the Warrington Local Plan is likely to be submitted before 31st March 2018, the council will be able to continue with the current approach employed within its existing evidence base. However, any incurred delays in progressing the review of the local plan could mean that Warrington will have to align its 'policy-off' assessment of housing need to that of the newly proposed approach.

- 1.13. Currently, the Council's assessment of its Objective Assessed Housing Need (OAHN) is 955 dwellings per annum. The newly proposed methodology by DCLG produces a figure of 914 new homes per annum.
- 1.14. It should be noted that the Local Housing Need is expressed as a minimum figure for the number of new homes to be built, not a maximum. This is a minimum to ensure that there are enough homes to meet local need and avoid issues of affordability, and the council can then assess whether appropriate uplifts should be applied based on aspirations for economic growth.
- 1.15. The Government in its proposed new methodology is supportive of councils uplifting these housing targets above the minimum figure if they have ambition to increase employment and jobs in their areas. WBC's growth ambitions suggest increasing the Local Housing Need Figure to 1,113 new homes per annum. Wallace is supportive of WBC's approach and aspiration to raise the housing figure as set out in the consultation document.

1.16. Ultimately, these figures will form part of discussion and debate at the Local Plan's Examination in Public (EIP), with its independent chair appointed by the SOS, but it is important for stakeholders to present their views early. Wallace does not raise any major concern at this stage, but recommends that the Council provides detailed evidence on the methodology as the Plan progresses and reserves the right to comment should the methodology change.

2. POLICY CONTEXT

Warrington New Town

- 2.1. In 1968 Warrington was designated as a New Town, primarily to take economic advantage of its unique position at the hub of the region's communication network, aided by the arrival of the regions motorways. The Warrington New Town Outline Plan, approved in 1973, set out a strategy to expand the town's population from approximately 120,000 to 200,000 by the year 2000.
- 2.2. The Corporation responsible for the New Town was dissolved on 30 September 1989. Since the end of the New Town, Warrington has continued to grow and there is no indication that this will slow down. It is apparent from the Council's aspirations that Warrington's next chapter is to enable the transition of Warrington from a New Town to a New City. These aspirations have only grown since discussions on devolution, the Northern Powerhouse, and the concept of locally led garden cities have emerged in recent years.
- 2.3. Wallace supports the Council's growth aspirations and the transition to the New City and strongly believes that the higher levels of growth for the Borough will be beneficial and maintain Warrington as one of the most dynamic and fastest growing area in the UK¹. Wallace considers Warrington is strategically positioned to take advantage of the growth within the Northern Powerhouse and region as a whole.

Adopted Core Strategy

- 2.4. The Warrington Local Plan Core Strategy was adopted by the council on 21 July 2014. It aimed to build on the successful regeneration of the town centre and the inner urban areas of Warrington, supported by strategic and local infrastructure investment.

- 2.5. It set a housing target of 10,500 new homes (equating to 500 per year), and 227 hectares of employment land between 2006 and 2027. However, as a result of a successful High Court Challenge, parts of the plan relating to housing policies were quashed. Details concerning housing numbers, distribution and strategy were abolished, with exception of reference to 1,100 new homes at the Omega Strategic Proposal. Therefore, there is a required need and urgency to ensure that a new local plan for Warrington is adopted to provide the certainty and framework for investment and the delivery of much needed new homes, and employment land provision.

Devolution Deals and the Northern Powerhouse Agenda

- 2.6. The Liverpool City Region and Greater Manchester Devolution deals (2015) saw the election of Steve Rotherham as the first Liverpool City Region Metro Mayor and Andy Burnham as Mayor for Greater Manchester in May 2017. Amongst other things, it has created devolved planning powers to encourage regeneration and development.
- 2.7. As an associate member of the Liverpool City Region combined authority, Warrington is able to benefit from the forthcoming development of a Single Statutory City Region Framework supporting the delivery of strategic sites across the City Region, and helping to accelerate economic growth and new housing development.
- 2.8. Warrington also sits within close proximity to the Greater Manchester Combined Authority, and is able to access a new £300m fund for housing; enough for an extra 15,000 new homes over ten years. As the new Mayor takes lead on these issues he is in a strategic position to contribute to the growing Northern Powerhouse Agenda and capable of providing increased investment and growth towards Warrington.

Devolution Deal for Warrington & Cheshire

- 2.9. The proposed sub-regional partnership between Warrington Council, Cheshire East Council, and Cheshire West and Chester Council for devolution is still being discussed with the Government. It is proposed that subject to the outcome of the governance review, a new Mayor would be elected in May 2018.
- 2.10. If a devolution bid is agreed with the Government, the Cheshire and Warrington Local Enterprise Partnership (LEP) predict that it could see growth amounting to a £50 billion economy, and the creation of 127,000 new jobs and 139,000 new homes across the region.

¹ Cheshire & Warrington LEP – Strategic Economic Plan

Locally-Led Garden City

- 2.11. The Government has made a commitment to support locally-led garden cities and villages. Each place is unique, but they all offer big opportunities for transformational long-term housing growth. As part of the consultation on the Local Plan review, WBC has prepared a development concept for the garden city suburb, south of Warrington. This is one of the locations proposed for new development as part of the preferred development option and the council considers this area could provide over 7,000 new homes.
- 2.12. The development concept is an illustration of how development could comprise and sets out the likely infrastructure required to support this level of growth, such as new schools, health facilities, parks and transport improvements. The development concept identifies potential transport infrastructure to support development and suggests that a number of new routes including a further crossing of the ship canal may be required.
- 2.13. Wallace supports the transformational change and aspirations for growth which underpin the preferred development option but acknowledge that delivery of the garden suburb and remaining preferred options require further detailed consideration to ensure delivery of homes within the early years of the plan period.



3. PREFERRED DEVELOPMENT OPTION CONSULTATION

Introduction & Overview

- 3.1. The previous Issues and Options stage was consulted on between 24th October and 5th December 2016. The Council received a total of 78 responses to the consultation. The majority were from developers and landowners although responses were also received from Parish Councils, local residents, and other stakeholders.
- 3.2. Having further considered the proposed scope of the Review, the Council has concluded that there is a need for a new Local Plan, incorporating the elements of the adopted Core Strategy that remain up to date, rather than a partial alteration to the adopted Core Strategy.
- 3.3. It is clear that the emerging Warrington Local Plan is factoring in the potential growth effects from the current wider political ambitions in the North West. Based on a review of the evidence base, the council is proposing a housing target of 1,113 homes per annum over the 20 year Plan period and an overall employment land target of 381 hectares; this figure is in line with the Devolution Growth scenario set out in the 2017 Addendum Strategic Housing Market Assessment (SHMA).
- 3.4. This target is the first of the six strategic objectives outlined in the consultation document which aims to build on the current successful regeneration of the town centre and the inner urban areas of Warrington. This is complemented by the release of Green Belt land and supported by wide ranging strategic and local infrastructure investment, and the creation of new sustainable neighbourhoods which will deliver the step change in taking Warrington from a New Town to a New City. Wallace supports the Strategic Objectives for the Local Plan and the transition of Warrington from a New Town to a New City.

Preferred Development Option

- 3.5. In order to arrive at the preferred development option, there were four key stages of work:
 - Stage 1: Confirming the development needs and associated land requirements
 - Stage 2: Define the Strategic Objectives
 - Stage 3: Assess the spatial options to accommodate the development
 - Stage 4: Assess options for development locations

Stage 1 - Development Needs & Associated Land Requirements

Confirming Development Needs- Planning for Growth

- 3.6. The consultation document seeks to align job growth and housing needs consistent with the NPPF (paragraph 158) and PPG (ID 2a-018). The Council has taken the decision to plan for a level of growth which accords with the LEP's Strategic Economic Plan (SEP), over and above the baseline economic jobs forecasts for Warrington. The 2017 SHMA Update considers the impact of the LEP devolution proposal to create 31,000 additional jobs in the Borough from 2015 to 2040. It is understood this would equate to 28,520 additional jobs over the SHMA period to 2037. Based on past trends it is also highly likely that higher rates of economic growth could be achieved and this would suggest a corresponding increase in the housing requirement.
- 3.7. Based on the Evidence set out above, the Council is proposing a housing target of 1,113 homes per annum over the 20-year Plan period (22,260) and employment land target of 381 ha. Wallace broadly supports this approach and the proposed land requirements. However, the strategic location of Warrington between the two city regions, and Cheshire and Lancashire provides continued impetus for growth and Wallace considers that the alignment with the SEP is logical,

realistic, and appropriate, but could be exceeded further.

- 3.8. The 2017 SHMA Update also highlights that Warrington is a net importer of labour and the Council's aspiration for continued growth in jobs will lead to an increased desire to live within the area and thus a greater provision of new homes would be required.
- 3.9. An area of concern that is not addressed by the 2017 SHMA Update, is that it makes no allowance for increased Household Formation Rates (HFRs) in Warrington in the future. Whilst the latest projections continue to assume lower HFRs for younger households, the continued failure to deliver enough homes to meet need, an intensifying affordability crisis and growing evidence of younger households being excluded from the housing market remains a major issue.
- 3.10. The 2017 SHMA Update identifies a significant need for affordable housing in addition to an accrued backlog. This effectively means whilst better than national averages, Warrington needs to build more affordable homes as part of the housing offer and particularly early in the plan period to start to address these issues.
- 3.11. Wallace is pleased to see the positive approach that the Council has adopted and is generally supportive of the proposed housing target of 1,113 homes per annum over the Plan period and an employment target of 381 hectares. However, Wallace stress that this figure should be continued to be expressed and be considered as a minimum, and the delivery of new homes in the early part of the plan period is required to address backlog need and affordability generally.
- 3.12. Based on the above, Wallace believe Warrington could accommodate higher levels of growth and therefore, greater flexibility in the supply of land is required to

adapt to changing circumstances in the plan period and beyond.

Maximising Urban Capacity

- 3.13. The Council produced an Urban Capacity Statement in October 2016 as part of the Issues and Options consultation. Since then, further work has been undertaken to update the evidence base (July 2017) in aid of producing a more robust figure for identifying capacity within Warrington's urban area. This work sits alongside the updated 2017 SHLAA and Economic Development Needs Assessment (EDNA).
- 3.14. Through the Urban Capacity assessment, the Council has stated (paragraph 4.10) that 15,429 homes and 129 ha of employment land can be accommodated in the urban area. This is a combination of 9,721 homes identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA) and 7,588 homes from the masterplanning work for the Waterfront, the Town Centre and inner Warrington. To avoid double counting a reduction of 2,285 has been applied.
- 3.15. Wallace supports the Council's intention to maximise any existing suitable and deliverable capacity within the urban area, as typically, these sites will be close to existing infrastructure and local amenities and will support the comprehensive regeneration and revitalisation of existing communities. However, Wallace express caution to the assumptions made in regards to delivery, and also the anticipated trajectory. Wallace is concerned that the levels of delivery anticipated from the urban area particularly in the first 10 years of the plan is optimistic, particularly given the identified and widely acknowledged difficulties of developing some of the sites. There are many plots within the urban capacity work/waterfront regeneration plan that have occupiers and alternative uses.
- 3.16. The Council anticipate that approximately 10,000 homes will be delivered in the first 10 years of the

plan within the existing urban area. The City Centre / Waterfront Masterplan Trajectory Datasheet suggests significant levels of annual delivery on a number of sites. It is questionable as to whether these levels will be achieved given the reliance on the delivery and completion of the Western By-pass and high-level bridge from the A56, over the Manchester Ship Canal, and through to the A57 Liverpool Road. There are also a number of town centre sites that will require significant Council intervention through CPOs and infrastructure before they can be fully developed.

- 3.17. Wallace therefore raises concern over the timescales and deliverability of 15,429 dwellings projected to be delivered within the plan period. This emphasises the need for pragmatic policy mechanisms to readily enable early delivery of the Garden City Suburb (SWUE), outlying settlements and their respective infrastructure as soon as possible.

Land Requirements for Homes and Employment

- 3.18. Table 1 of the consultation document incorporates a 5% flexibility factor in addition to the housing requirement. In principle, Wallace supports the inclusion of a buffer to provide flexibility to ensure the plan can adapt to change and conform with NPPF by being positively prepared with the aim to significantly boost housing supply.
- 3.19. However, given the growth aspirations of the Council and the significance placed on 3 large growth areas; The Waterfront; The Garden City Suburb; and the South West Urban Extension, Wallace stress that a 5% flexibility factor does not build in enough room for slippage, which is inevitable, and will not ensure that even the minimum plan requirement will be met within the plan period.
- 3.20. Wallace is supportive of the identified growth areas but are aware of the multitude of land ownerships, requirements for other complementary uses and

significant infrastructure, all of which, only increase the risk of slippages against the housing trajectory. The Council at paragraph 4.13, state that the 5% flexibility factor (as currently applied) is at the lower end of flexibility rates. Wallace suggests the application of a 20% buffer is applied to the overall housing land requirement to ensure the housing requirement, expressed as a minimum, is met in full. Wallace note that a 20% buffer has been applied to the employment land provision, however, it is not clear why a similar buffer has not been applied in respect of housing. This would also be consistent with the recommendations of the Local Plan Expert Group (LPEG) to Government.

- 3.21. Wallace note the SHLAA and Urban Capacity study identify a number of sites with planning permission as being deliverable. However, it appears unclear as to whether caution has been taken to any subsequently lapsing via non-implementation. Non-implementation rates are something that has been a topic of much debate at local plan examinations and S78 planning appeals, and it is now a fairly established practice to apply a 10% reduction to existing commitments with planning permission to account for non-implementation. Therefore, Wallace urge the council to undertake caution (if not already) in its assumptions and apply a 10% reduction to sites with planning permission unless there is compelling evidence not to.
- 3.22. The 2017 SHLAA and Consultation document considers and assumes all sites will achieve a 75% gross to net ratio developable area. Wallace expresses serious concern with this generalisation as each site depending on gross size, the particular context of where it's situated, and the policy, technical, and utility constraints affecting it, all mean that developable areas can differ significantly from site to site. Wallace state a 75% gross to net ratio could be true for standalone sites ranging from 50-300 dwellings, however, for large strategic allocations such as the proposed Garden City suburb, it could fall below 55%.

3. PREFERRED DEVELOPMENT OPTION CONSULTATION cont'd

3.23. The AECOM Development Framework for the garden suburb provides the bones for which to build on, to help further understand the requirements for each stakeholder/landowner. However, until further detailed analysis of the infrastructure requirements and how this is to be located and funded is known (particularly in the case of the Garden Suburb), a more informed gross to net ratio is not likely to be known. This work will be fundamental in informing how much land will be needed within the plan period, and beyond, and could mean some of the safeguarded land (as currently identified) may have to come forward within the plan period and therefore, additional suitable and available land will be needed to be safeguard for development post 2030.

Safeguarding Requirements

3.24. Wallace supports the Council's intention and provision of safeguarded land within the local plan in line with the NPPF, which is clear, that where necessary, Local Plans should provide safeguarded land to meet longer term development needs stretching **"...well beyond the plan period..."** and that local authorities should satisfy themselves that Green Belt boundaries **"... will not need to be altered at the end of the development plan period..."**.

3.25. Table 3 of the consultation document outlines the Council's approach to calculating the safeguarding land requirement to ensure Green Belt boundaries are capable of enduring for a further 10 years beyond the 20-year plan period. The Council state that due to the application of a 5% flexibility factor already included to meet housing need within the 20-year plan period, only 9 years' equivalent of safeguarded land is required (as 5% is equivalent to 1-year supply). The calculation of the safeguarded land requirement also considers the application of a 20% buffer concerning employment land which equates to a further 5 years of supply.

3.26. The above would amount to some 15 years supply of safeguarded land and this would appear to conform to the NPPF (para 157), however, Wallace asserts that the 20-year time horizon for the plan period should be utilised. Such a time horizon will ensure proper plan making for the future and provide a framework for robustly managing, shaping, and the protecting the Green Belt beyond the plan period. This will also provide certainty to the development industry and local communities of the likely growth locations beyond the end of the plan period.

3.27. Wallace questions the Council's logic for including the flexibility factors into the calculation of the safeguarded land requirement. This is because, the 5% buffer (for housing) and 20% buffer (for employment land) is to ensure flexibility and that the housing requirement expressed as a minimum is met in full within the plan period. It follows therefore, that if these are required/delivered during the plan period they will not be available for future development.

3.28. Wallace refer the Council to the previous concerns raised regarding generalisations of density (30dph) and gross to net developable area ratios (75%).

3.29. Paragraph 4.24 of the consultation document indicates that a similar urban to Green Belt spatial distribution split (64% to 36% respectively) will be appropriate for future development beyond the plan period. Wallace stress that this assumption is too simplistic and contradictory, as it doesn't take into account the Council's own ambitions to maximise the development of the urban area within the plan period. Therefore, it follows that if the majority of urban land is developed as anticipated, it will not be available after the end of the plan period. This suggests a greater reliance upon safeguarded land outside of the urban area beyond the plan period.

3.30. Wallace also highlight that the safeguarded land (as currently proposed) is wholly located to the east of Warrington and is presented (by the Council) as an option to provide an eastern extension to the Garden City Suburb. Whilst Wallace can understand some logic in the approach the Council has taken, it is unclear how the future requirements of other areas and settlements will be dealt with beyond the plan period. Therefore, Wallace recommend that the Council consider providing additional safeguarded land in other areas such as the outlying settlements and areas which could provide significant additional local (and wider) highway infrastructure solutions beyond the plan period. Furthermore, it may be that sites are allocated in areas where significant prior infrastructure is not required meaning homes can be quickly delivered upon grant of planning permission.

3.31. Wallace asserts that the plan needs to provide triggers which would indicate when the safeguarded land would be considered for release, such as a shortfall in the 5-year housing land supply. The Government's *'housing delivery test'* suggested in the recent Housing White Paper², will require action to be taken if delivery falls below 95% of the annual housing requirement. The release of safeguarded land should be triggered if the plan is failing to deliver as anticipated.

Stage 2 - Strategic Objectives for the Local Plan

3.32. Wallace is generally supportive of the strategic objectives although they will need to be refined to reflect any changes resulting from this consultation.

² DCLG 2017: Fixing our broken housing market

Green Belt Exceptional Circumstances

- 3.33. The Council's evidence base and Issues and Options consultation made an early recognition that despite maximising the capacity of the existing urban area, it is apparent that if Warrington is to meet the development needs arising from its growth aspirations, it can only do so through the release of Green Belt land.
- 3.34. Wallace supports this approach and agrees that the Council has identified the exceptional circumstances required within the NPPF (para 83). The only comment Wallace would seek to make in this regard is that additional Green Belt land for immediate release and for safeguarding purposes may be required in addition to the land and requirements currently identified.
- 3.35. As part of the Local Plan Review the Council commissioned Arup to undertake a Green Belt Assessment (October 2016). Wallace made comments on the study at the Issues and Options stage and reference should also be made to these representations.
- 3.36. Due to representations received at the Issues and Options stage the council have produced an addendum (July 2017) to the Green Belt report which assesses the impact of affected land by the proposed and confirmed HS2 route. The report also includes assessment of all of the sites put forward in the 2016 SHLAA in line with the five purposes of Green Belt.

Stages 3 & 4 - Assessment of the High Level Spatial Options and Preferred Development Option

- 3.37. Following this process, three High Level Spatial Options were defined for the distribution of new development.
- Green Belt release only in proximity to the main

Warrington urban area;

- Majority of Green Belt release adjacent to the main urban area and incremental growth of outlying settlements; and
 - Settlement extension in one or more settlements with the remainder of growth adjacent to the main urban area.
- 3.38. The second Option was confirmed as the Preferred Option and this is supported by Wallace.
- 3.39. Having established this Strategic Option, the Council has looked in more detail at the main development locations.
- 3.40. These are complemented by continued development in the existing urban area and incremental growth in Warrington's outlying settlements. The main options considered were:
- **Option 1** - A Garden City Suburb to the south east of the Warrington main urban area of approximately 8,000 homes
 - **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
 - **Option 3** - A Garden City Suburb of approximately 6,000 homes & an urban extension to the west of Warrington of up to 2,500 homes
 - **Option 4** - A Garden City Suburb of approximately 4,000 homes & an urban extension to the south west of Warrington of up to 2,000 homes & urban extension to west of Warrington of up to 2,500 homes
 - **Option 5** - A more dispersed pattern of Green Belt release adjacent to the main urban area
- 3.41. Out of the 5 proposed options, the Council concluded that **Option 2, a Garden City Suburb and an urban extension to the south west of Warrington is the preferred development option.** The council arrived at this option by assessing each against

the Strategic Plan Objectives, taking into account the results of the Sustainability Appraisal. Whilst Option 1 also performed well against Plan objectives, the Council felt that there are deliverability and infrastructure risks regarding concentrating such a high level of development in one location.

- 3.42. The Options containing a Western Urban Extension did not perform well against the Green Belt objectives given the strong performance of the Green Belt in the west of the borough, both with regards to general character area and individual parcel/development site level. The western component also raised issues from an infrastructure delivery perspective given the relatively fragmented nature of available sites. The main concern with Option 5 was the ability to ensure infrastructure delivery, particularly for larger infrastructure requirements including a new secondary school, with the risk of worsening the already severe congestion within the main urban area.

Preferred Development Option

- 3.43. The Preferred Option promotes the creation of new sustainable communities alongside brownfield development and significant infrastructure delivery to finish off the New Town concept and to realise the vision of Warrington as a New City, with the addition of incremental growth within the identified outlying settlements.
- 3.44. Within the Preferred Development Option, there are four main growth areas (para 3.4) with incremental growth within the outer lying settlements. The four main growth areas are:
- **The City Centre;**
 - **The Waterfront;**
 - **The Garden City Suburb; and**
 - **The South West Urban Extension.**

3. PREFERRED DEVELOPMENT OPTION CONSULTATION cont'd

3.45. The preferred development option is generally supported by Wallace, but Wallace has a number of concerns regarding the assumed delivery (start dates) and the anticipated rates of housing completions and their sustained delivery. Therefore, further evidence is required to justify the anticipated delivery rates between now and the publication of the draft plan. Specific concerns in the above regard are set out in further detail below.

The City Centre & Wider Urban Area

3.46. The continued regeneration of the town centre is a priority for the Council and is supported by Wallace. The Preferred Option builds on the existing City Centre Masterplan which includes higher density. The City Centre is to provide a total of 3,526 new homes throughout the plan period and is anticipated to come forward in the following phases of the plan:

- **0-5 years: 980 new homes (equivalent to 196 completions per annum)**
- **6-10 years: 1,629 new homes (equivalent to 407 completions per annum)**
- **11-15 years: 569 new homes (equivalent to 142 completions per annum)**
- **16-20 years: 348 new homes (equivalent to 87 completions per annum)**

3.47. The Wider Urban Area including Omega will provide for a further 4,869 houses and is a continuation of the current allocations in the adopted Core Strategy (2014). These sites are already allocated and some are currently under construction. They are anticipated to come forward in the following phases of the plan:

- **0-5 years: 1,560 new homes (equivalent to 312 completions per annum)**
- **6-10 years: 2,271 new homes (equivalent to 568 completions per annum)**

- **11-15 years: 1,038 new homes (equivalent to 260 completions per annum)**
- **16-20 years: 0 new homes**

3.48. Wallace refer the Council to previous comments made between paragraphs 3.13 -3.16 in these representations concerning the Council's overly optimistic delivery of sites within the City Centre and Wider Urban Area.

3.49. Specifically, in the case of sites within the Wider Urban Area, Wallace highlight that during years 6-10 the assumed rate of completions per annum is 568 which would require (on particularly large strategic sites) more than approximately 5 housebuilders concurrently building out their individual phases. Wallace consider this to be particularly optimistic.

Warrington Waterfront

3.50. The Waterfront is seen as a major development opportunity with the potential to plug a missing gap and create a new community with a country park and significant infrastructure. The Waterfront is to provide a total of 4,032 new homes throughout the plan period that is anticipated to come forward in the following phases of the plan:

- **0-5 years: 728 new homes (equivalent to 146 completions per annum)**
- **6-10 years: 795 new homes (equivalent to 199 completions per annum)**
- **11-15 years: 1,790 new homes (equivalent to 448 completions per annum)**
- **16-20 years: 719 new homes (equivalent to 180 completions per annum)**

3.51. The development of the Waterfront requires significant infrastructure prior to delivery such as the Western Relief Road and in particular, the high-level bridge

which is a prohibitor to early deliver of new homes. The construction of the bridge is dependent upon central Government funding and the release of HCA funding generated from land to the south of Warrington to facilitate the infrastructure needed. Also worthy of note are other issues such as multiple landownerships, flooding, increased potential for contamination, and bad neighbour developments. The site is currently constrained by Unilever, and Solvay Interlox, which in particular, is a hazardous installation.

3.52. Wallace is therefore pessimistic of the Waterfront's delivery until the later years of the plan period, if not beyond. The Waterfront Masterplan Trajectory Datasheet suggests some significant levels of annual delivery on a number of sites, however, there is no clear evidence or justification of how these levels of delivery have been arrived at.

South Western Warrington Urban Extension (SWWUE)

3.53. The South Western Urban Extension will provide a smaller urban extension of around 1,831 new homes, together with a new primary school and local centre. It is anticipated to come forward in the following phases of the plan:

- **0-5 years: 0 new homes**
- **6-10 years: 610 new homes (equivalent to 153 completions per annum)**
- **11-15 years: 610 new homes (equivalent to 153 completions per annum)**
- **16-20 years: 611 new homes (equivalent to 153 completions per annum)**

3.54. Wallace note the potential for Health and Safety issues related to the chemical works on the other side of the Manchester Ship Canal and the site's relationship with Halton and Higher Walton.

3.55. Whilst the SWWUE appears less dependent than the Waterfront on the final position of the Western Link Road from the A56 at Walton and the high-level Bridge, the proposals may constrain development until details on the preferred route are finalised. Wallace note some caution has been taken in regard to lead in times with no homes being anticipated to come forward until years 6-10. This in principle is welcomed, however it is not justified why a completely even spread of delivery across years 6-20 has been assumed.

Warrington Garden City Suburb - South Warrington Urban Extension (SWUE)

3.56. The creation of a new Garden City Suburb as an extension of south Warrington is a logical conclusion of the New City concept and mirrors the original New Town Plan. The Garden City Suburb is a crucial element in successful planning for the town. What sets Garden City suburbs apart from other large-scale developments is that it allows the necessary infrastructure to be planned in from the start, and existing communities can be protected from unsightly and unpopular piecemeal development.

3.57. The Garden City Suburb is to provide a major new employment area as an extension of the existing Appleton Thorn / Barleycastle estates at the intersection of the M6 and M56, and up to 7,274 new homes within the plan period. New homes are anticipated to come forward in the following phases of the plan (both Green Belt & Non-Green Belt land):

completions per annum)

- **16-20 years: 0**

Green Belt Land

- **0-5 years: 0 new homes**
- **6-10 years: 2,114 new homes (equivalent to 528 completions per annum)**
- **11-15 years: 2,096 new homes (equivalent to 524 completions per annum)**
- **16-20 years: 2,114 new homes (equivalent to 529 completions per annum)**

3.58. The initial development concept envisages the Garden Suburb will be focused around three garden neighborhoods, and centered on a new district centre and a new country park to the east. The Council has set out its full aspirations within the document and this is broadly supported by Wallace. Wallace highlight the need for close working and co-operation between the key landowners to develop a more detailed conceptual and deliverable masterplan, which adequately phases housing and employment land in conjunction with the necessary transport, education, and community infrastructure.

3.59. At present, it is proposed that the SWUE will be developed in a 20-year phased manner and each phase will consist of the necessary infrastructure. The development trajectory sets out an initial idea of how each phase will deliver the required housing numbers with the Garden City Suburb. Within the preferred option this is currently indicated as starting in years 6-10.

3.60. Wallace questions the Council's logic as to why the Strategic Road 1 is not identified to come forward alongside housing development and employment land in the West in the early years of the plan period. Clearly, this Strategic Road is paramount as it facilitates

vehicular access and movement from within the Garden City Suburb in the west to the east. Wallace asserts that the western gateway at Junction 10, M56 into the Garden City Suburb should be considered in isolation as an early phase, and that it could be brought forward whilst simultaneously providing the necessary infrastructure needed.

3.61. As expressed previously within these representations there is clearly a need to ensure early deliver of the Council's preferred development options, specifically, the Garden City Suburb, with an emphasis on homes being delivered in years 0-5 of the plan period.

3.62. Wallace is aware of the multiple landownerships within the Garden City Suburb and the varied vested interests. It is very likely that some landowners do not wish to seek development upon their land, and therefore, consideration in how the Garden City Suburb is delivered, should incorporate these factors early in the Council's decision-making process to avoid prolonged legalistic action that may arise as a result of Compulsory Purchase Orders.

Outlying Settlements

3.63. At paragraph 5.46 of the consultation document the Council defines an approximate number of homes to be accommodated in each of the outlying settlements under the 'incremental growth' scenario.

3.64. The figure of approximately 1,190 new homes is expressed as being potentially deliverable across the outlying settlements and the Council at table 22 identify each settlement's indicative Green Belt capacity as the following:

- **Lymm: 500 new homes**
- **Culcheth: 300 new homes**
- **Burtonwood: 150 new homes**
- **Winwick: 90 new homes**

Non-Green Belt Land

- **0-5 years: 406 new homes (equivalent to 81 completions per annum)**
- **6-10 years: 496 new homes (equivalent to 124 completions per annum)**
- **11-15 years: 48 new homes (equivalent to 12**

3. PREFERRED DEVELOPMENT OPTION CONSULTATION cont'd

- **Croft: 60 new homes**
- **Glazebury: 50 new homes**
- **Hollins Green: 40 new homes**

- 3.65. The Council acknowledge at this stage the above numbers are indicative with the actual numbers to be determined once they have undertaken a 'detailed assessment' of the potential development sites submitted, the associated implications of the character of the respective settlements, the permanence of the amended Green Belt boundaries, and respective impact upon the local highway infrastructure. The preferred options document at paragraph 5.47 identifies that if the above levels of development are delivered, it will be necessary to expand existing primary school provision in Lymm, Culcheth, and Burtonwood. It is also stated that it will be necessary to provide additional primary care capacity in Lymm and Burtonwood.
- 3.66. To ensure that the plan delivers its housing requirement in full, Wallace recommends greater flexibility is provided, see paragraphs 3.18 to 3.22 above. This flexibility should be through a greater provision of sites in areas which will not directly compete with the urban area or south / south west of Warrington. This will not only ensure that the aspirations for the other areas are not diluted but will ensure a greater diversity of supply, and accelerate the provision and supply of new homes in years 0-5 of the planning period. Wallace consider the outlying settlements could provide additional flexibility through the provision of further allocations for immediate release and/or safeguarding.
- 3.67. The Council's appraisal of development options appears to assume that development outside of the main urban area of Warrington and its immediately surrounding Green Belt cannot contribute to realising Warrington as a New City. Wallace assert that this is an overly simplistic interpretation of a New City, which

whilst focusing on Warrington Town, will be supported by sustainable and thriving outlying settlements that offer choice for new and existing residents.

- 3.68. It is suggested that post the preferred options consultation the Council will identify sites to be allocated and / or potentially safeguarded. However, in recognition of the proposal set in the recent Housing White Paper concerning Neighborhood Plans being able to make minor revisions to Green Belt boundaries to support housing development, the Council have left the door ajar for Parish Councils to potentially take on this task through the preparation and production of a Neighborhood Plan.
- 3.69. Utilising Neighborhood Plans as a mechanism for allocating sites may incur further delay and uncertainty in terms of delivery. Therefore, in line with the thrust of argument in creating flexibility in the plan and delivering much needed homes within the early years of the plan period (0-5), Wallace encourages WBC to identify site allocations for the outlying settlements within the Local Plan.

Overall Observations - Infrastructure Requirements & Viability

- 3.70. Wallace supports the Council's preferred development option and acknowledge that significant investment in infrastructure will be required. However, it is not fully clear within the consultation how this infrastructure is intended to be funded or what the timescales are for bringing it forward in conjunction with housing and employment land in a coordinated, comprehensive, and phased manner. If a significant proportion is to be funded through market housing schemes this will need to be carefully managed to ensure the viability of particular sites are not stretched.

3.71. Wallace notes the BNP Paribas high level assessment in terms of infrastructure delivery and viability and Wallace reserves right to comment when future detailed work becomes available.

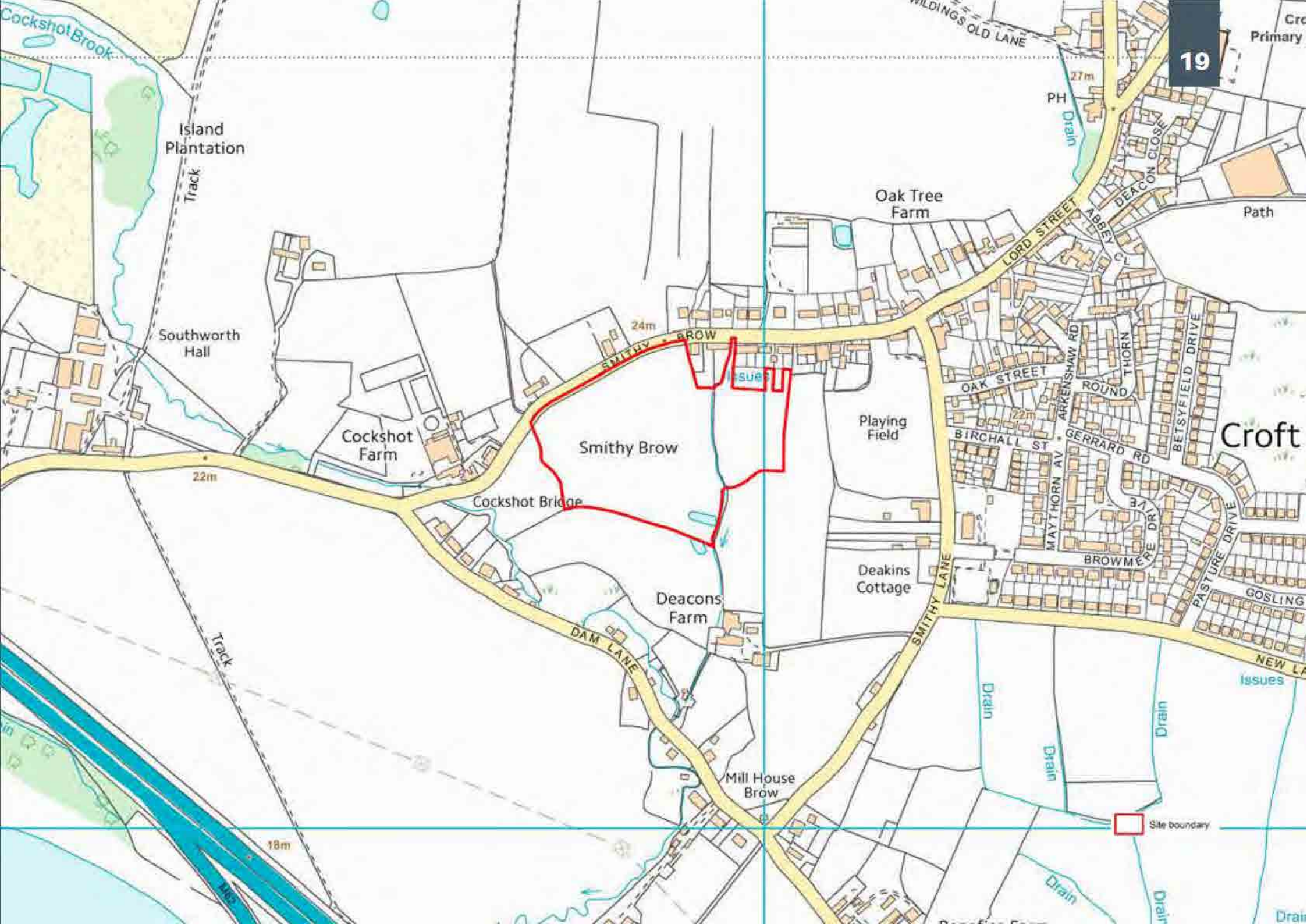
3.72. Specifically, in the case of the Garden Suburb, there is a significant requirement for infrastructure to support the proposed level of growth: including a network of new distributor roads; a new secondary school; up to 4 new primary schools; a new country park; a district centre; health facilities and leisure facilities; and employment land. Due to the acknowledgement of the significant infrastructure that is required, Wallace encourage the Council to allow for adequate lead in times for infrastructure delivery, receipt of planning permission (both outline, and reserved matters and discharge of conditions), site preparation, construction, sale and occupation. This is because Wallace notes that the anticipated build out rates for the growth areas either in part or whole appear to be overly optimistic and in some instances, would require up to 5 housebuilders on site at the same time.



Part 2.

Development proposals





Site boundary



4. LAND OFF SMITHY BROW, CROFT

Introduction

- 4.1. Wallace controls 2.9ha (7.3 acres) of land off Smithy Brow, Croft, which has the potential to provide a sustainable development that can accommodate up to approximately 90 new homes (30% of which to be affordable), informal and formal public open space, locally equipped areas of play, and the provision of a retail/local convenience store.
- 4.2. The Preferred Development Option outlines incremental growth to the outlying settlements and based on an 'indicative capacity' of the Green Belt within each outlying settlement to accommodate development. For Croft, this is identified as approximately 60 new homes.

Settlement Profile of Croft

- 4.3. The strategic location of the Borough between the two city regions of Cheshire and Lancashire means the outlying villages of Warrington offer a highly desirable and attractive location to live. This can be said particularly in the case of Croft where average house prices are among the highest across the outlying settlements.
- 4.4. Croft's strategic advantage is its proximity to the M6 Junction 21A and M62 interchange which provide regional and national connections. Croft is also within close proximity to the Warrington urban area and the major employment hubs at Birchwood and Risley, with nearby connections to the A59 and A579 enabling ease of access to nearby Winwick and Culcheth.
- 4.5. According to the Settlement Profile Document July 2017, Croft has a population of approximately 1,367 (January 2017) (based on 606 households) with an age profile for the Culcheth, Glazebury and Croft ward of 16.3% aged under 16, 61.9% aged 16-64, and 21.8% aged 65+ (2015).

- 4.6. Croft benefits from an attractive village location, however, does lack a basic offer of shops and services with the existing local shop closing down in February 2017. This increases the reliance on day to day services in nearby Winwick and Culcheth, and therefore, the existing demographic would benefit from increased housing provision to ensure local shops and services are sustained.

Incremental Growth in Croft

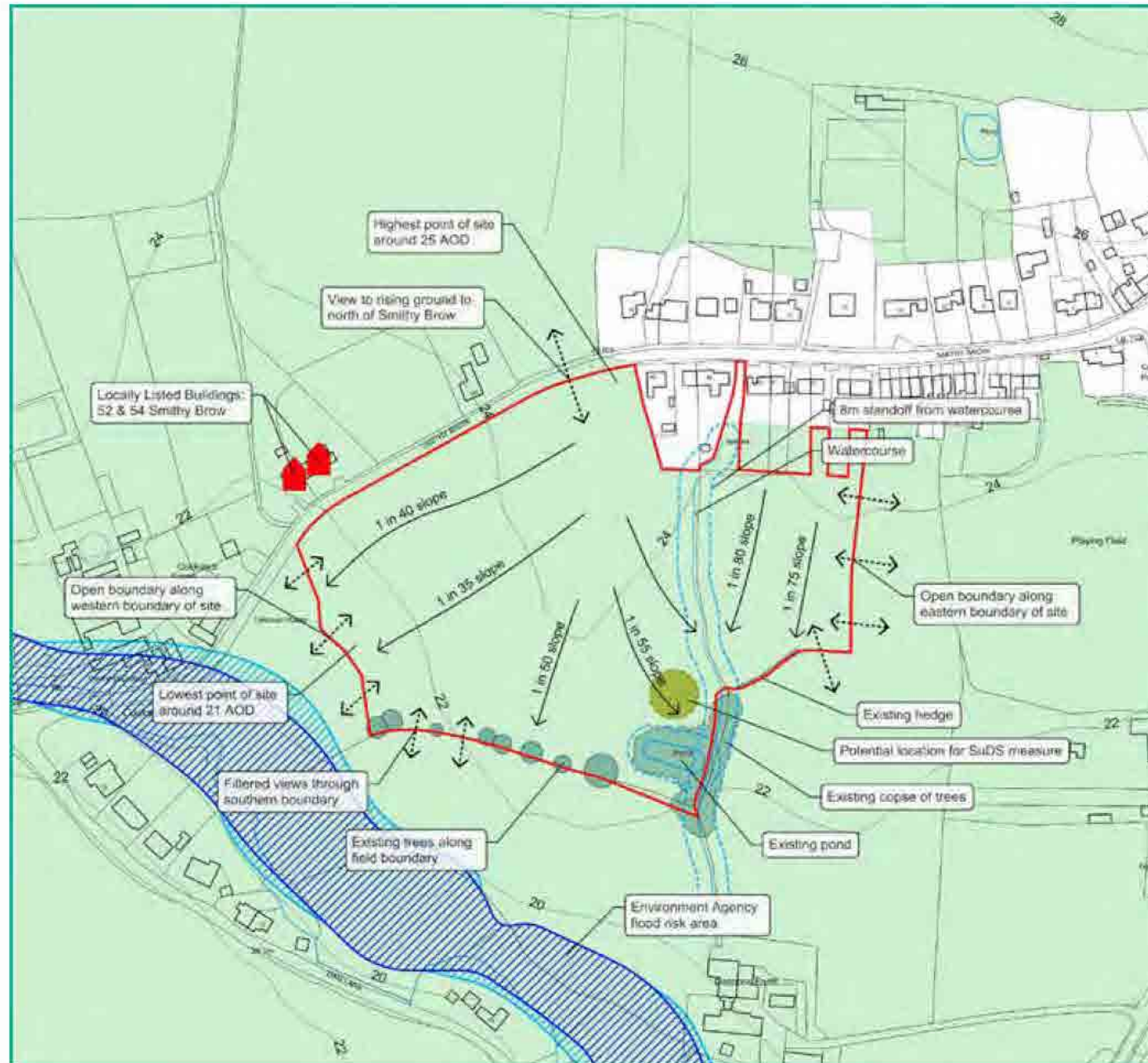
- 4.7. The Consultation document, as highlighted earlier, defines an approximate number of homes the Council considers could be accommodated in each of the outlying settlements under the 'incremental growth' scenario. The Council acknowledge at this stage that this figure is indicative, with the actual numbers to be determined once they have undertaken a 'detailed assessment' of all the potential development sites submitted, the associated implications of the character of the respective settlements, the permanence of the amended Green Belt boundaries, and impacts on local highway infrastructure.
- 4.8. Wallace highlights that the current growth identified for Croft would only equate to a 10% increase and Wallace considers that considering the affordability issues prevalent within Croft, provision of additional suitable, sustainable, and deliverable land is required. Wallace suggest that to ensure a real effect is made upon affordability issues, and that Croft has an appropriate demographic to sustain local services, that the Council, subject to specific site assessment, should pursue growth in the order of 20%.
- 4.9. The Preferred Development Option Document at paragraph 5.47 identifies that if the currently proposed levels of development are delivered, it will be necessary to expand existing primary schools in Lymm, Culcheth, and Burtonwood. It is also stated that it will be necessary to provide additional primary care capacity

in Lymm and Burtonwood. If Croft is to accommodate growth above the current 10% level then clearly this will need to be considered alongside appropriate education, health, and community infrastructure provision.

- 4.10. Wallace assert that in order to achieve the growth aspirations for the New City, the outlying settlements play a crucial role as sustainable thriving settlements, which offer further choice in the supply of new homes to new and existing residents. Furthermore, the nature and size of likely allocations within the outlying settlements will typically not require significant prior infrastructure, and thus, can deliver homes within the early years of the plan period.

The Site

- 4.11. The site is located on the western approach to the village of Croft and is bound by Smithy Brow to the north, agricultural land to the south and east, and residential properties along Dam Lane to the west. The site benefits from mature hedgerows and tree belt along its southern boundary.
- 4.12. The site presents a sustainable strategic development opportunity to accommodate up to approximately 90 new homes (up to 30% of which will be affordable), informal and formal open space, locally equipped areas of play, and land for a retail/convenience store.



- Site boundary
- Existing trees within the site
- Green Belt
- Environment Agency Flood zone 3
- Environment Agency Flood zone 2
- Environment Agency existing waterbody 8m buffer
- Watercourse within site
- Potential location for SuDS measures
- Direction of slope
- Open boundary to site
- 🏠 Locally Listed Building:
Local List Parish Order

4. LAND OFF SMITHY BROW, CROFT cont'd

Sustainability of Location

4.13. The site is situated at the hub of the village's amenities. To the east is a public house, youth centre, bowls club, and playing fields and within 800m north along Smithy Brow is Croft Primary school. Bus services are available immediately adjacent to the site on Smithy Brow and Croft Primary and St. Lewis Catholic Primary Schools are located less than a mile away. Birchwood Community High School is located approximately 3.5 miles south of the site and Culcheth High School 3 miles north east. Birchwood Technology Park is less than 3 miles away and supports over 165 businesses and over 6,000 employees.

SHLAA & Green Belt Assessment - Land off Smithy Brow, Croft

- 4.14. The site was submitted via the Call for Sites in 2016 (R18/098 & R18/052). It was assessed in the 2017 SHLAA as part of the ongoing process to identify the Borough's 'deliverable' and 'developable' supply of housing land.
- 4.15. Land off Smithy Brow, Croft was assessed within the SHLAA 2017 as being 'constrained' due to its designation as Green Belt. It is apparent that the site's SHLAA assessment takes the format of the standardised response used by the Council when assessing Green Belt sites:

Sites within the Green Belt, unless in compliance with the provisions of appropriate development as defined by the NPPF, are considered unsuitable due to policy constraints. In such circumstances, it is premature for the SHLAA to endorse specific sites in the Green Belt as suitable for residential development in advance of any comprehensive review of Warrington's Green Belt to evaluate whether there are appropriate locations for future development.

- 4.16. The Arup October 2016 Green Belt assessed the functionality of Warrington's Green Belt in accordance with the five functions of the Green Belt, namely:
- To check the unrestricted sprawl of large built up areas;
 - To prevent neighbouring towns from merging into one another;
 - To assist in safeguarding the countryside;
 - Preserving the setting and special character of historic towns;
 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

4.17. The Arup October 2016 study distinguished Green Belt functionality into four categories:

- No contribution;
- Weak contribution;
- Moderate contribution; and
- Strong contribution.

4.18. The first stage of the report distinguished Warrington's Green Belt into 24 overarching character areas. Land off Smithy Brow, Croft is identified within character area 1 which is assessed as serving a moderate contribution to Green Belt purposes.

4.19. The October 2016 Green Belt Assessment then went on to assess individual parcels within the defined character areas. Land off Smithy Brow is identified as reference CR8 and is assessed as providing an overall Moderate contribution to the function of the Green Belt.

4.20. CR8 is assessed as the following:

- **No contribution:** to check the unrestricted sprawl of large built-up areas
- **Weak contribution:** to prevent neighbouring towns merging into one another
- **Strong contribution:** to assist in safeguarding the

- countryside from encroachment
 - **No contribution:** to preserve the setting and special character of historic towns
 - **Moderate contribution:** to assist urban regeneration by encouraging the recycling of derelict and other urban land.
- 4.21. The July 2017 Green Belt report addendum assessed all sites that had been submitted as part of the 2016 call for sites consultation. Land off Smithy Brow was again, assessed as performing a moderate contribution to Green Belt purposes.

RSK Landscape Assessment

- 4.22. RSK were commissioned by Wallace to review Arup's analysis and categorisation of land off Smithy Brow. The full assessment by RSK is attached as an appendix and should be read in conjunction with these representations.
- 4.23. RSK have provided a review of landscape and visual effects and is based on the broad principles established in the following best practice guidance:
- The Landscape Institute and the Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3); and
 - Scottish Natural Heritage and the Countryside Agency (2002) Landscape Character Assessment: Guidance for England and Scotland.
- 4.24. The analysis considers the preliminary baseline conditions of the proposed development context but does not attempt to score the significance of potential effects; however, it does identify potential issues for further consideration in subsequent design proposals.

4. LAND OFF SMITHY BROW, CROFT cont'd

- 4.25. A high-level desk based review of landscape designations and policy has been undertaken along with a desk-based study of aerial imagery and Ordnance Survey mapping.
- 4.26. A site survey was undertaken on Wednesday 20th September 2017; the weather conditions were predominantly cloudy with good visibility.
- 4.27. In line with Arup's methodology, professional judgement was applied to categorize the overall level of contribution to the Green Belt for land off Smithy Brow.
- 4.28. The assessment undertaken by RSK identifies shortcomings in Arup's analysis which did not fully appreciate or consider the durability of the boundaries between the site and wider countryside to the south which would contain encroachment. In addition, although there are open views within the immediate vicinity of the site, long line views are restricted by further vegetation and urban form between the parcel and open countryside, with the exception of very limited long line views to the north. In applying professional judgement, RSK determine Land off Smithy Brow provided a moderate contribution to purpose 3 rather than strong reported by Arup. In light of this, RSK asserts the overall classification should be amended so that Land off Smithy Brow is categorised as providing an overall weak contribution to Green Belt purposes.

Croft SHLAA Submissions

- 4.29. Wallace note several submissions have been made in respect of sites presented as development opportunities in Croft. These are located to the north of Smithy Brow, and to the north-western edge of Croft. Wallace do have any site-specific observations at this stage, but acknowledge that locating potential

development allocations to the west of Croft is likely to have an impact on a locally designated wildlife site, and encourage un-sustainable modes of transport as Lady Lane lacks a continuous footpath and is isolated from the existing amenities of Croft. Wallace also note the general piecemeal nature of the sites submitted which would not provide a similar level of community benefits or establish a core heart for Croft like the development proposals for land off Smithy Brow.

Development Trajectory

- 4.30. The development trajectory is set out for all the key areas identified in the Preferred Development Option and shows how the Council sees these areas delivering the required number of new homes and employment land over the next 20 years.
- 4.31. For the outlying settlements, the trajectory outlines the delivery of 488 new homes in years 0-5, 901 new homes in years 6-10, and 40 new homes in years 11-15. Wallace welcomes the delivery within the early years of the plan, and as previously stated, the outlying settlements are key to delivering much needed homes in the early years of the plan period. However, Wallace contend that the Council could be more aspirational in terms of an increased number of homes being delivered in years 0-5. Therefore, Wallace welcomes the Council to accommodate additional growth in the outlying settlements which will service to maintain a rolling 5-year housing land supply as required by the NPPF and ensure more homes are delivered within the early years of the plan.

Density Assumptions

- 4.32. As part of the consultation the Council has sought views on the appropriate density to be applied in this area to balance residential quality against the need to minimise Green Belt release. Wallace raises caution of a

'one size fits all' approach as housing densities should respond to local context and the constraints and opportunities of each site.

- 4.33. Land off Smithy Brow, Croft can accommodate between 30-35 dwellings per hectare which is considered suitable for a village location with proposals reflecting the character and appearance of the area.

Safeguarded Land

- 4.34. The requirement for safeguarded land for development beyond the plan period will depend upon the assumptions made in regard to anticipated densities applied to the 4 growth areas in Preferred Development Options. Wallace refers the Council to previous comments made concerning the spatial distribution and calculation of the Safeguarded land requirement. Wallace supports the provision of safeguarded land and believe that it is important to safeguard land in the outlying villages in contrast to further provision near or within the 4 identified growth areas. This will ensure that if safeguarded land needs to be brought forward within the plan period to rectify under delivery, it will not be as dependent on significant infrastructure.

SITE APPRAISAL

Access

- 4.35. Vehicular, pedestrian and cycle access will be provided off Smithy Brow with an easily accessible network of paths and public rights of way.

Green Belt

- 4.36. The site is currently located within Warrington Green Belt, which was first established in 2006. The M56 and A49 will provide a clear defensible boundary position to the south and west of the site. Existing field boundaries to the west can be strengthened to form a new inner Green Belt boundary.

Agricultural Land Classification

- 4.37. The site comprises mainly of Grade 3, which is good to moderate quality agricultural land, as described in MAFF (1988) *Agricultural Land Classification of England & Wales*.

Topography

- 4.38. The site is relatively flat but slightly undulates from east to west, and rises up slightly towards Smithy Brow in the west.

Drainage / Flooding

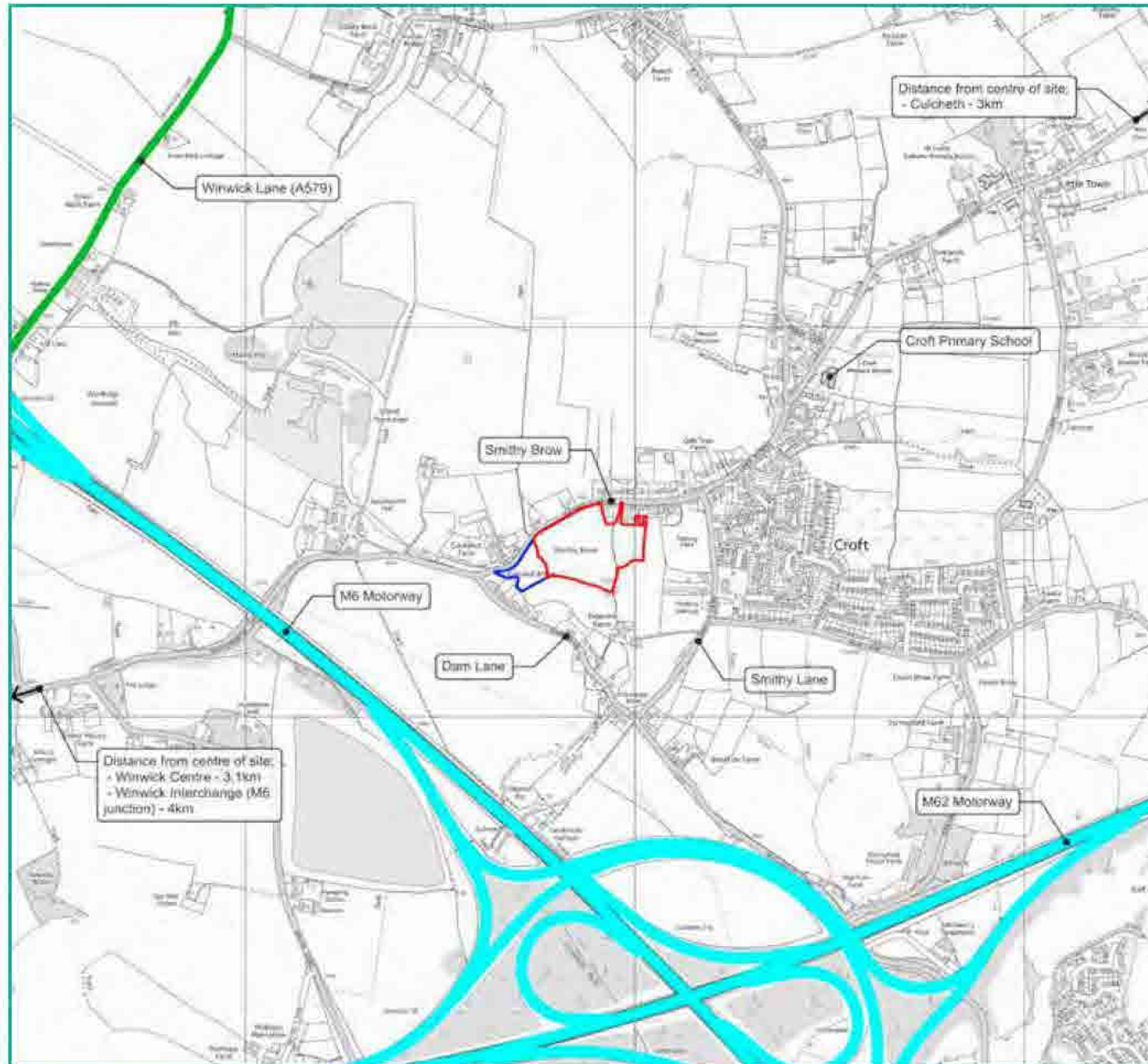
- 4.39. Environment Agency flood mapping confirms it is in Flood Zone 1 and therefore is at low risk of flooding. An appropriate flood risk assessment will be undertaken as part of a planning application.





- 4.40. The proposal will incorporate SUDS measures to ensure that surface water from the proposal meets greenfield run-off requirements. The existing waterbody will be incorporated as part of the scheme and utilised for surface water run off where appropriate.

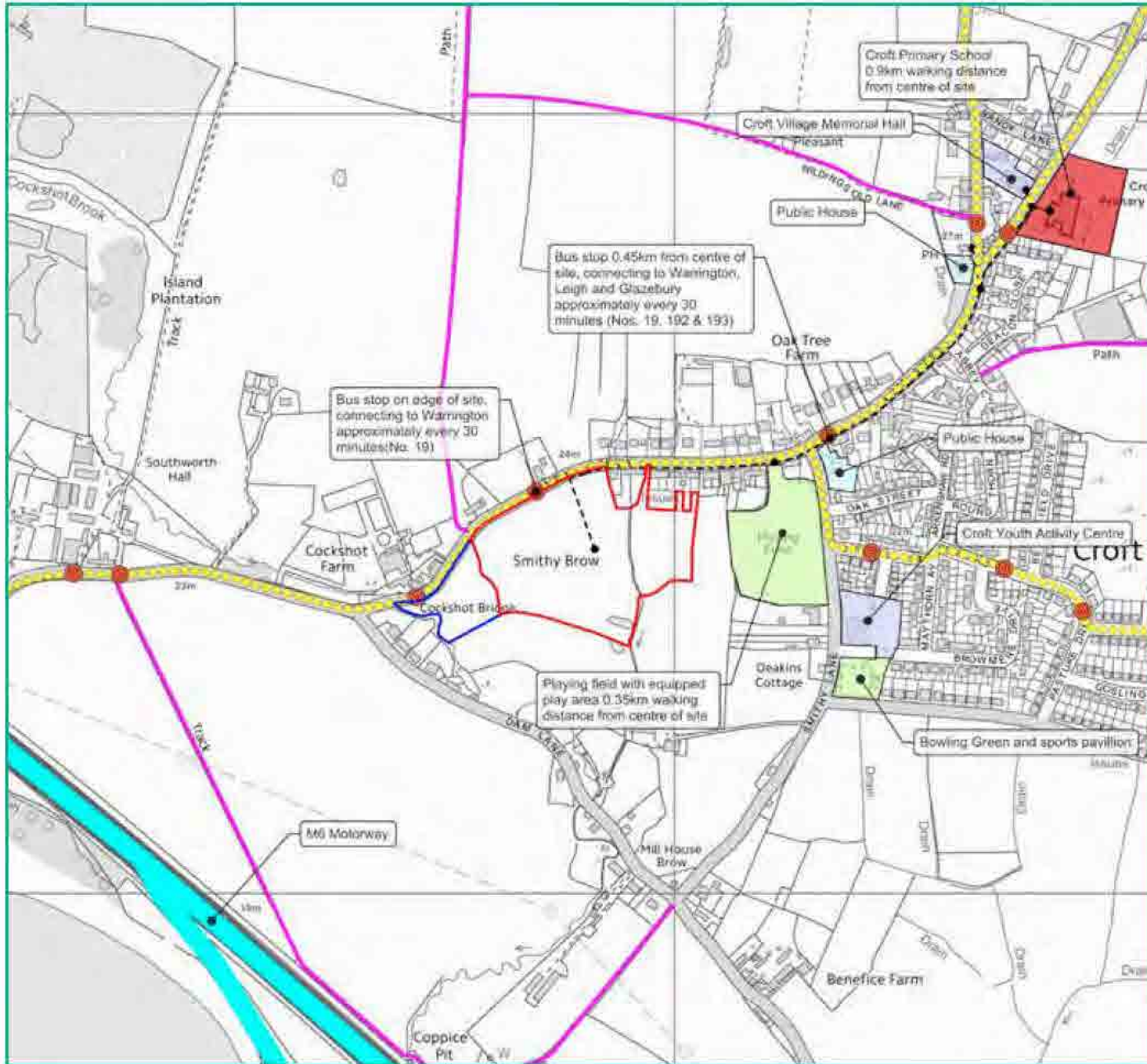
Indicative Development Framework

- 4.41. The site presents a sustainable strategic development opportunity to accommodate residential development within easy reach of existing amenities in Croft. It can accommodate up to approximately 90 new homes (up to 30% of which to be affordable) together with informal and formal public open space, locally equipped areas of play, and land to accommodate a retail/ local convenience store.
- 4.42. Homes will include 2, 3, 4 and 5 bedroom market houses and affordable housing. All homes will be accessible within a safe environment. The proposal is designed to integrate with the existing vernacular of Croft and provide a logical and natural extension based around its existing amenities.
- 4.43. The movement hierarchy around the site will provide safe and convenient access for pedestrians and cyclists. This is achieved through a combination of shared surface lanes and a remote path network.
- 4.44. Existing public rights will be integrated into the proposal, allowing ease of connection to the wider countryside.
- 4.45. Structure planting will be provided along the southern and western boundaries of the site, and will define a new permanent Green Belt boundary. The structure planting will provide visual screening and an attractive edge to the development.

- 4.46. The structure planting will incorporate rural paths around the site and will promote biodiversity and form a key element in establishing of new wildlife habitats and corridors in the area.
- 4.47. The proposal will maximise the future prospects of success by delivering a balanced demographic makeup to sustain and enhance existing day to day services and amenities within Croft.



-  Site boundary
-  Additional area within title ownership
-  Motorway
-  'A' Road



- Site boundary
- Additional area within title ownership
- Land use: School
- Land use: Leisure (hotel, pub etc.)
- Land use: Outdoor sports facilities
- Land Use: Community
- Bus route
- Bus stop
- Public Right of Way
- Walking distance from centre of site
- Motorway

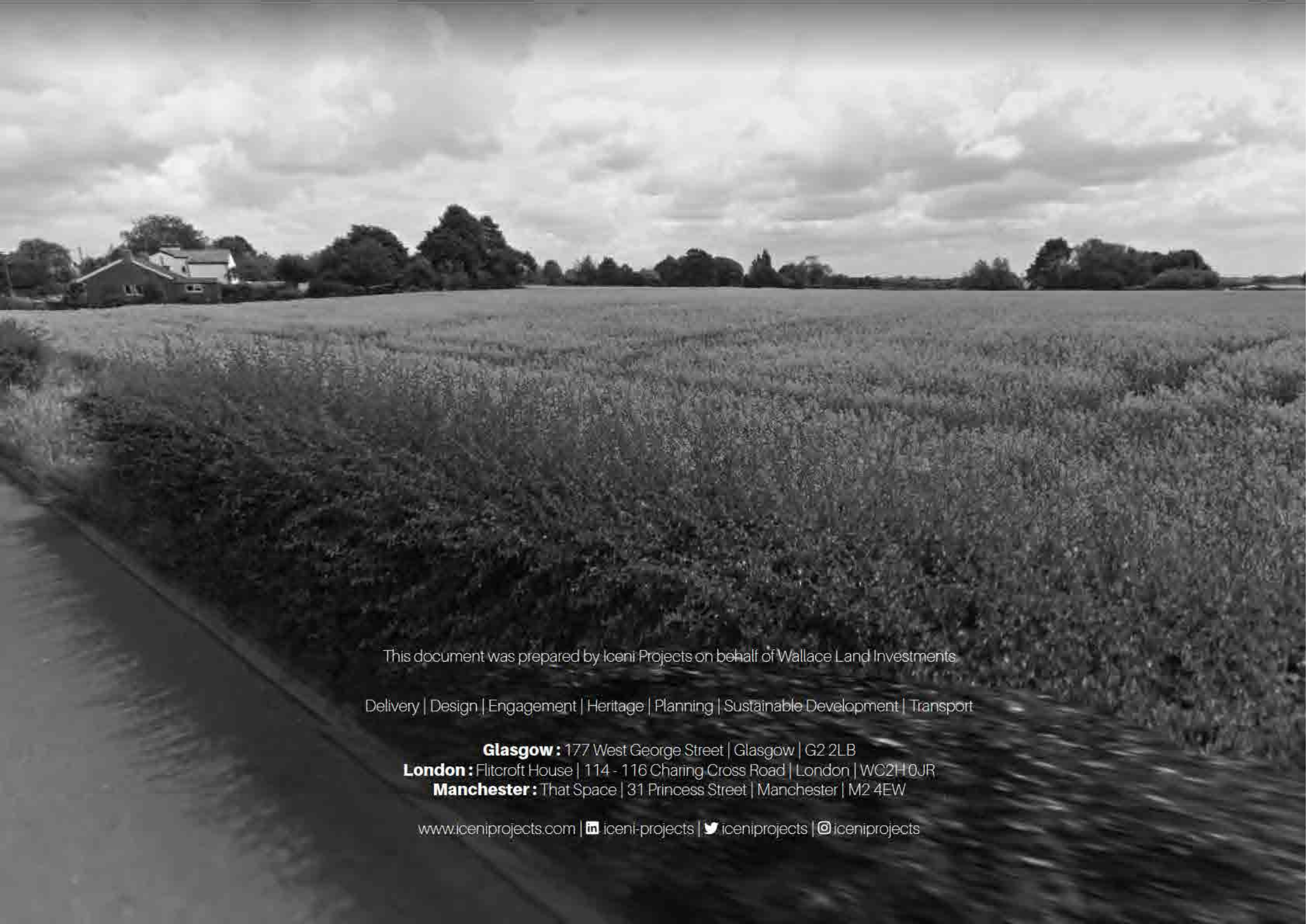


- Site boundary - 4.08ha / 10.08 ac
- Additional area within title ownership
- Potential development area - 2.9ha / 7.3 ac
- Frontage
- Potential location for convenience store
- Potential open space provision
 - Amenity open space
 - Meadow grassland
 - Potential location for SuDS measures
 - Existing trees
 - Potential tree planting
 - Potential community use area
 - Potential country park
 - Existing waterbody
 - Existing watercourse
 - Neighbourhood street
 - Lane
 - Path
 - Potential connections to playing field and adjoining land
 - Node
 - Potential location of play area
 - Vehicular access

Conclusion

- 4.48. Wallace wishes to work in partnership with the Council, the local community and other agencies to deliver the vision for the Land off Smithy Brow, Croft.
- 4.49. The site is in a sustainable location and the proposal represents a sustainable development that provides a natural, complimentary extension to the existing village hub of Croft and redefines a new robust and permanent Green Belt boundary.
- 4.50. Representations for this proposal will also be made through the SHLAA process. Should the site be allocated in the draft published Local Plan, then a planning application for outline planning permission could be lodged immediately, and would likely be mid-2018. Thereafter, allowing for a two-year lead in period to secure all necessary consents, construction of Land off Smithy Brow, Croft would commence in late 2019.





This document was prepared by IcenI Projects on behalf of Wallace Land Investments

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